

# **2015 Workload Study for** **Licensing Program Analysts**

California Department of Social Services  
Community Care Licensing Division

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## Contents

Table of Tables and Figures .....	5
Chapter One: Introduction and Overview .....	7
Chapter Two: Methodology .....	10
Creating the LPA Staffing Needs and LPA Budget Standards: Basic Steps .....	10
The 2015 Daily Activity Log.....	11
DAL Data Collection .....	13
DAL Submission Statistics .....	14
DAL Data Methodology: Two Key Roles .....	15
Identifying and Measuring Undone Work .....	17
Data Sources for Projecting Workload Volume .....	19
Chapter Three: DAL Data: Facility-Specific Field and Case Work.....	21
Primary Activities and Average Hours per Visit .....	21
Supplemental Visit Types and Average Hours per Visit .....	22
Travel Time per Site Visit .....	23
Other Case-Related Work.....	23
Chapter Four: DAL Data: General Supportive LPA Duties .....	25
Chapter Five: 2015 Case-carrying LPA Staffing Needs and Budget Standards.....	26
Current Case-carrying LPA Staffing Need .....	26
Senate Bill 79.....	26
2015 Case-carrying LPA Staffing Needs Overview and Findings .....	28
2015 Case-carrying LPA Budget Standards by Facility Type and Inspection Frequency .....	28
Study Limitations.....	32
Recommendations: Changing Workload Volume .....	33
Recommendations: Increasing Case-carrying LPA Time in the Field .....	33
Chapter Six: Centralized Complaint and Information Bureau.....	35
Introduction .....	35
Section 1: CCIB Methodology .....	35
The 2015 Daily Activity Log.....	35
DAL Data Collection .....	36
DAL Submission Statistics .....	36
Section 2: CCIB DAL Data Analysis .....	37
Two Key Roles.....	37
Section 3: CCIB Call Disposition Data Analysis .....	38
Section 4: CCIB Average Time per Complaint Call .....	40

Section 5: CCIB Projecting Call Volume and Total Hours .....	40
Section 6: CCIB LPA Staffing Needs .....	42
Section 7: CCIB LPA-specific Limitations and Conclusions .....	43
DAL Data.....	43
Disposition Data .....	43
Projecting Future Workload .....	43
Glossary of Abbreviations and Terms .....	44

## Table of Tables and Figures

Table 1.1: Mandated Inspection Frequencies by Fiscal Year, an Alternate Inspection Frequency Scenario, and LPA Staffing Needs for Each Scenario, by Program Area and Division (Case-carrying LPAs) .....	8
Table 2.1: Number and Percent of LPAs Included and Excluded from Data Analysis, by Program Area (Case-carrying LPAs) .....	14
Table 2.2: Number of Rows (15 Minute Segments) Recorded by LPAs with Useable Entries (Case-carrying LPAs) .....	14
Table 2.3: Number of Facilities, Number of Facility Visits, and Number of Complaints Received (Case-carrying LPAs) .....	15
Figure 2.1: DAL Data: Workload Categories as a Percent of Reported Time (Case-carrying LPAs) .....	16
Table 2.4: LPA Post-Data Collection Survey and Estimated Annual Number of Undone LPA Hours (Case-carrying LPAs) .....	18
Table 2.5: Total Undone LPA Duty Hours and the Number of LPAs to Perform those Hours (Case-carrying LPAs) .....	19
Table 2.6: Projection Bases and Time Factors for Annual Hours Projections (Case-carrying LPAs) .....	20
Table 3.1: Routine Comprehensive Inspection Activity and its Component Tasks: Average Hours per Task and Total Hours per Inspection Activity, by Program Area .....	21
Table 3.2: Average Hours to Complete All Work Associated with Licensing Application, Comprehensive Inspection, and Complaint Investigation Activities (CRES) .....	22
Table 3.3: Average Hours to Complete All Work Associated with Licensing Application, Comprehensive Inspection, and Complaint Investigation Activities (ASC) .....	22
Table 3.4: Average Hours to Complete All Work Associated with Licensing Application, Comprehensive Inspection, and Complaint Investigation Activities (CC) .....	22
Table 3.5: Supplemental Hours per Visit, by Program Level .....	23
Table 3.6: Average Hours Traveling, Number of Visits, and Travel Hours per Visit, by Program Area .....	23
Table 3.7: Total Hours of Case Work Reported on the DALs, by Program Area and Division .....	24
Table 4.1: General Supportive LPA Duties, Number and Percent of Hours Reported on DALs (Case-carrying LPAs) .....	25
Table 5.1: Current LPA Staffing Need Using 2015 Methodologies, by Program Area and Division .....	26
Table 5.2: Senate Bill 79 Amendments to Health and Safety Codes 1534 and 1569.33 .....	27
Table 5.3: Rate of Inspections per 100 Facilities for Five Year, Triennial, Biennial, and Annual Inspection Frequencies .....	27
Table 5.4: 2015 Case-carrying LPA Staffing Needs Differing by Current, Upcoming, and Alternate Inspection Scenarios, by Facility Type (All Program Areas) .....	29
Table 5.5: 2015 Case-carrying LPA Budget Standards by Current, Upcoming, and Alternate Inspection Scenarios, by Facility Type (All Program Areas) .....	29
Table 5.6: 2001 and 2015 Case-carrying LPA Budget Standard Comparisons (Annual Inspection Frequencies) .....	31
Table 6.1: CCIB LPA DAL Activities: Initial Rows, Hours, and Percent of Time, Including Training and Unusable Entries .....	36
Table 6.2: CCIB LPA DAL Data: Activity and Task Entries as Reported on DAL Submissions .....	37
Table 6.3: CCIB LPA DAL Data: Number and Percent of DAL Entries, Re-categorized .....	38

Figure 6.1: CCIB LPAs: Proportion of CCIB LPA Duties Worked During 13 Week Data Collection Period ....	38
Table 6.4: CCIB LPA Call Data: Bureau Call Dispositions January 20 <sup>th</sup> 2015 to April 30 <sup>th</sup> 2016 .....	39
Table 6.5: CCIB LPA DAL Data: Call Categories, Number of Entries, and Number of Calls.....	40
Table 6.6: CCIB LPAs: Using CCL Visit-citation Reports to Determine Percent Increase in Complaint Calls.	41
Table 6.7: CCIB LPAs: Calculating Projected Number of Complaint Calls .....	42

## Chapter One: Introduction and Overview

Community Care Licensing (CCL), a division of the California Department of Social Services, oversees almost 75,000 day care and residential care facilities across the state. At any given time there are approximately 1.4 million Californians—vulnerable infants, children, disabled adults, and seniors—who rely on services from these facilities.<sup>1</sup> CCL is the sole licensing agent for these facilities, employing approximately 450 licensing program analysts (LPAs) who directly monitor these care facilities in one of three program areas: (1) children’s residential facilities, (2) adult/senior care facilities (both day and residential), and (3) family day care homes and children’s day care centers.<sup>2</sup>

The majority of LPAs visit facilities for license applications, routine inspections, and complaint investigations. In addition to this field work, they perform essential duties in support of their role as case-carrying LPAs. An additional small number of LPAs work in the newly created Centralized Complaint and Information Bureau, responding to telephone calls from the public and routing callers to regional offices as necessary. These LPAs do not carry a caseload, and do not do field work. Chapter Six presents the CCIB-specific workload study findings.

In the late 1990s, CCL contracted with the Institute for Social Research (ISR) at Sacramento State University to perform an LPA Workload Study, published in 2001. That report supplied LPA Staffing Needs and Budget Standards, which are still in use today.<sup>3</sup> LPA staffing need is the number of LPAs required to monitor all CCL facilities, and Budget Standard is the number of facilities one LPA can reasonably monitor in one year, including field work, other case work, and general supportive LPA duties.<sup>4</sup> LPAs cannot monitor facilities in the absence of their general supportive duties. A broad range of operational, budget, and regulatory changes in California’s licensing environment necessitate review of and updating the staffing needs and standards: in 2015 the California State Legislature approved changes to facility inspection frequencies for all licensed care facilities.<sup>5</sup> Currently the division must inspect facilities no less often than once every five years, and in addition, 20% of facilities are subject to random inspection each year.<sup>6</sup>

The new legislation mandates that all three programs routinely inspect facilities no less often than once every three years, and randomly inspect 30% of facilities each year. As presented in this report, the 2015 study findings demonstrate that CCL needs **620** LPAs to comply with this Stage 1 triennial inspection frequency mandate. This scenario will take effect January 1, 2017. In Stage 2, beginning January 1<sup>st</sup>, 2018, children’s residential and adult/senior care facilities will be subject to a biennial routine inspection frequency and 20% random annual inspections. Child care centers and family child care homes will continue to have the triennial routine/30% random inspection frequency. CCL will need **630** LPAs to cover this increased work load. Stage 3 (beginning January 1<sup>st</sup>, 2019) changes the routine inspection frequency in

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<sup>1</sup> In addition to residential care facilities for the elderly, some adult residential facilities provide licensed care for people who are chronically ill or have special health care needs, regardless of age. Adult day facilities provide services to seniors and adults (18 or older) in need of daily assistance or care. Note that Skilled Nursing Facilities do not fall under the purview of CCL; the Department of Health Care Services regulates those facilities.

<sup>2</sup> With the exception of Certified Family Homes (CFH); foster family agencies license and inspect those facilities. However, CCL *does* investigate complaints filed against CFHs.

<sup>3</sup> Barnes, Carole and Sandra Sutherland: Workload Study of Licensing Program Analysts, prepared for the California Department of Social Services, Community Care Licensing Division, August 2001. Institute for Social Research, California State University Sacramento.

<sup>4</sup> General supportive LPA duties, also known as non-field work, include: activities and tasks that cannot be attributed to a single facility file or a single inspection or complaint investigation

<sup>5</sup> CA Senate Bill No. 79, statutes of 2015, Chapter 20

<sup>6</sup> Some facility types are currently subject to required annual inspections (typically for previous non-compliance findings).

adult/senior care facilities to an annual schedule; the division will need **678** LPAs to fully staff this scenario. Table 1.1 shows the progressive change in staffing need for each stage.

Table 1.1 also presents an alternate staffing needs scenario developed at CCL’s request, which increases the children’s residential inspections to an annual basis and does not change the inspection frequencies in the other two program areas: the division would need **689** LPAs to fully staff this alternate scenario.

**Table 1.1: Mandated Inspection Frequencies by Fiscal Year, an Alternate Inspection Frequency Scenario, and LPA Staffing Needs for Each Scenario, by Program Area and Division (Case-carrying LPAs)**

Time frame*		CRES	ASC	CC	Division
2016/2017	Inspection frequency:	Three years	Three years	Three years	
	Percent random inspections	30%	30%	30%	
	LPA Staffing Need	149	202	269	620
2017/2018	Inspection frequency:	Two years	Two years	Three years	
	Percent random inspections	20%	20%	30%	
	LPA Staffing Need	151	210	269	630
2018/2019	Inspection frequency:	Two years	One year	Three years	
	Percent random inspections	20%	0%	30%	
	LPA Staffing Need	151	258	269	678
Alternate scenario	Inspection frequency:	One year	One year	Three years	
	Percent random inspections	0%	0%	30%	
	LPA Staffing Need	162	258	269	689

CRES: Children’s residential program; ASC: Adult and senior care program; CC: Child care program; Division: All three programs, case-carrying LPAs

\*In addition to the findings in this table, Chapter Five presents LPA Staffing Needs and Budget Standards findings under the current five year/20% random inspection frequency; those findings are calculated with the revised and new methodologies presented in this report

The 2015 LPA Staffing Need and Budget Standard methodologies and formulae presented in this report and its Appendix empower CCL to adjust its staffing needs appropriately—scaling staffing levels up or down based on substantive changes in the number of facilities, inspection frequencies, or the like.<sup>7</sup>

This report proceeds as follows:

For case-carrying LPA staff:

- Chapter Two describes methodologies for calculating LPA staffing needs, DAL data uses, and measures of undone work. It also describes CCL data’s role in projecting future workload volume
- Chapter Three presents facility-specific field and other case-related work, and travel time data as recorded on the DALs
- Chapter Four describes general supportive LPA duties that are not related to a specific facility file, again using DAL data
- Chapter Five presents the LPA Staffing Needs by program area and division, and Budget Standards at the facility level, including the number of case-carrying LPAs needed to perform undone work. It also provides the baseline staffing level for all non-inspection work, and how many additional LPAs are needed to perform the triennial, biennial, and annual inspections, by facility type and program area. Chapter Five concludes with study limitations and recommendations specific to case-carrying LPAs

<sup>7</sup> ISR can train CCL staff how to adjust the formulae.



For Centralized Complaint and Information Bureau (CCIB) staff:

- Chapter Six presents the methodology and findings for non-case-carrying LPAs in the CCIB bureau, as well as limitations and conclusions specific to CCIB LPAs

For all LPAs:

- Appendix A (separate) provides extensive methodological details and associated data
- Appendix B (separate PDF document) contains the Daily Activity Log and the post-data collection survey administered to LPAs in December 2015

A Glossary of abbreviations and terms completes this report.

## Chapter Two: Methodology

Determining the number of LPAs needed to monitor all facilities and perform all other LPA duties (LPA Staffing Need) is a multi-step process, incorporating DAL data findings and projected future field work volume. Our work also incorporated measures of undone work as appropriate. This chapter presents the following:

- The basic components of the 2015 LPA Staffing Needs and the Budget Standards
- The 2015 LPA Daily Activity Log (DAL), our central data collection instrument
- The 2015 data collection process, protocols, and final sample details
- DAL data analysis methods
- Overdue visits
- Other undone work
- Other data sources used to project future workload volume

### *Creating the LPA Staffing Needs and LPA Budget Standards: Basic Steps*

The LPA Staffing Needs is the total number of LPAs needed to accomplish all LPA duties per year, by program area or facility type.<sup>8</sup> The LPA Workload Budget Standard is defined as the number of facilities that one LPA can oversee in a given year, when accounting for field work, other facility-specific case work, and general supportive LPA duties. These two numbers are not static: each incorporates projected numbers of visits and open facilities using calculations that can be tailored to changing circumstances.

The **LPA Staffing Needs**, the number of case-carrying LPAs needed to fully staff the division, is calculated with three key components:

- A. Hours for facility work: The total number of LPA hours needed to complete all projected field and other case work (including all visit-associated tasks and travel) in a given year
- B. Hours for other LPA responsibilities: The total number of LPA hours needed to perform all general supportive LPA duties (non-field work duties)<sup>9</sup>
- C. Personnel year hours: The number of work hours available in a given year, for one full-time LPA

Adding together A and B provides the total number of hours needed to accomplish all LPA work in one year. If we divide that total by the number of hours one LPA has available each year (1,689 hours<sup>10</sup>), we arrive at the number of LPAs it takes to perform all that work. Putting it in the form of a simple formula:

$$\text{LPA Staffing Need} = (A + B) \div C$$

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<sup>8</sup> All Centralized Complaint and Information Bureau (CCIB) DAL data findings are reported separately and apart from program and division level totals in Chapter Six. The calculated number of LPAs needed to appropriately staff CCIB is in addition to the (case-carrying) LPA Staffing Needs, presented in Chapters Two, Three, and Four.

<sup>9</sup> Activities and tasks that cannot be attributed to a single facility file or a single inspection or complaint investigation, to include: receiving/responding to phone calls, emails, and other correspondence; caseload analysis, itinerary planning, and review; committing collected documents to case files or individual subject files; coordination of shared office tasks with other LPAs; administrative paperwork and duties, etc.

<sup>10</sup> 1,689 hours is one full-time employee's annual work hours to perform LPA duties (2,050 personnel year hours, adjusted for holidays, vacation time, allowed sick leave, other leave to 1,778 (as per communication with CDSS Financial Management and Contracts Branch, July 2014) and minus training hours (89 hours: five percent of LPA responsibilities:

<http://www.cclcd.ca.gov/Res/pdf/LPA-ChildCare.pdf> and <http://www.cclcd.ca.gov/Res/pdf/LPA-Residential.pdf>, accessed July 11, 2016)

A Budget Standard is the number of facilities one LPA can monitor per year, and it builds upon the LPA Staffing Needs by including the number of open facilities. This formula divides the number of facilities by the number of LPAs needed to oversee those facilities.<sup>11</sup> In other words:

**Budget Standard = Number of open facilities ÷ LPA Staffing Need**

Underneath these simple formulae, however, many calculations of varying levels of complexity must occur. We describe the multiple methodologies we used to arrive at these seemingly simple formulae in a general way in this chapter, and in greater detail in Appendix A Chapter Two. In addition, each report chapter has a corresponding chapter in the Appendix, which documents report chapter findings. The methodologies use DAL data and other sources of information to account not only for the workload that the staff performed during the study collection period, but also the backlog of tasks that were not completed by LPAs at the current staffing levels (leading to backlogs, additional workload for program managers, and delays).

Developing LPA Staffing Needs and Budget Standards begins with data collection, which brings us to the next section in this chapter.

### *The 2015 Daily Activity Log*

To measure work performed at the current staffing level, we created and administered data collection instruments—Daily Activity Logs (DALs)—with which LPAs reported all aspects of their daily workload. LPAs completed and submitted a DAL every day during a 13 week sampling period in the fall of 2015.<sup>12</sup> Critically, unlike the 2001 DAL, the 2015 version required that LPAs record facility license numbers in relation to all relevant activities. This one change greatly improved the utility of the DAL data collected—we could now precisely track case-related tasks from start to finish – thereby providing a means of accounting for hours needed to accomplish current, undone, and projected workload needs.

In a traditional workload study, participants closely track and record everything they do during their entire work day in 15 minute increments. In this study, LPAs submitted a DAL at the end of each work day, or by 10 am the following work day morning. Because LPAs submitted their work in 15 minute activity segments for 13 weeks, we could reliably calculate average periods of time that LPAs spend on the various component tasks necessary for a given activity, how much of their days they spend traveling, etc. We expected that we could determine how long it typically takes to fully complete each of an activity's individual tasks, and therefore how long an activity takes, from start to finish.

*Work Group:* For the current workload study, CCL established a Workload Study Workgroup Committee to redesign many elements of the 2001 Daily Activity Log, to establish additional protocols to ensure maximum participation in the data collection process, and to collaborate with ISR on how to best tailor staffing needs and budget standards methodologies. Before data collection commenced, the Committee and ISR worked intensely to create a logically consistent grouping of activities and corresponding tasks intended to best yield reliable and valid findings. A sample DAL can be found in the Appendix B. During data collection, the Workgroup Committee continued to meet regularly to determine additional sources of useful data, and it created a post-data collection survey administered to all case-carrying LPAs in December 2015. The Workgroup Committee also asked Licensing Program Managers (LPMs) to report time they spent

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<sup>11</sup> The 2001 workload study used a variant formula to calculate Budget Standards: the number of personnel year hours available for case work divided by the total annual processing hours per facility (2001 report page 18). This report uses a formula which does not minimize the role of non-field work in its calculations. Nevertheless, Appendix Tables 5.11, 5.12, and 5.13 present the 2015 Budget Standards using that variant formula for comparison purposes.

<sup>12</sup> September 14<sup>th</sup> through December 11<sup>th</sup>, 2015.

performing LPA tasks during the month of December. We used these data to fill in the gaps, the undone work, that a DAL cannot by definition record.

The DAL Form: The Workgroup Committee’s deliberations produced highly specific and detailed DALs. Each program area’s DAL only differed in its facility code choices and the underlying submission programming.<sup>13</sup> LPAs used an Overtime/Weekend DAL when they worked any hours between 9 am and 6 am and any hours on weekends. LPAs recorded their work activities in 15 minute blocks of time throughout their work day; the DAL had one row for each 15 minute segment of time. If an LPA performed more than one activity in a single 15 minute block of time, ISR instructed them to record the activity that took the larger portion of the 15 minutes.

Within each 15 minute row, LPAs recorded:

- Activity (a category of work such as inspection, complaint investigation, etc.)
- Task (subparts of activities, such as inspection paperwork, site visit(s), site visit travel, desk work, etc.)
- Amount of task completed

When applicable:

- Facility visit types (including *primary* visits for activities such as licensing, inspections, investigations, as well as *supplementary* visits such as collateral, case management, and so on.)
- Facility codes
- Facility license numbers
- Complaint control numbers (licensed and unlicensed complaints)
- Name of facility or responsible person for unlicensed complaint investigations

We programmed DAL choices to increase LPA efficiency and data accuracy by only providing activity-specific task options. The LPA first chose an activity, and then a task. Task drop down menus showed items only relevant to the chosen activity. If the LPA performed a site visit, they chose “site visit” as the task, and then the appropriate visit type options appeared in the visit type field. If they forgot to choose the “site visit” task, they could not enter any visit type in the site visit field.

Importantly, and as mentioned earlier, the DALs also included fields in which LPAs recorded the facility type, facility license number, and/or complaint control number associated with relevant field or other case work activities and tasks. With this relatively granular information, we could tally both the amount of time spent working on individual facilities, and the number of individual facilities and complaint investigations LPAs worked on.<sup>14</sup>

LPAs were asked to identify an appropriate stage of activity or task completion for each 15 minute row. The completion field had four choices: *Initiating*, *In Process*, *Wrapping Up*, and *Completed*. In another field, if applicable, LPAs indicated how many incident and death reports they reviewed within each 15 minute block of time. To help clarify anything vague or unusual, or to add additional information if so desired, the DALs also included open entry fields for LPA comments.

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<sup>13</sup> We tailored the DAL email submittal programming such that each LPA’s submission automatically went to two non-LPA staff members in the LPA’s regional office, in addition to ISR. Those staff did not review the DAL contents. The “mandate” paragraph in the following “DAL Data Collection” section describes the regional office role more specifically.

<sup>14</sup> License number and complaint control number fields could be copied and pasted into all rows as necessary.

Finally, each DAL included an entry field that required LPAs to type “yes” in one last field, affirming that they were about to submit a complete and accurate record of their day’s work activities and hours worked. Without providing this affirmation, the LPA could not use the submit button on the form.

In summary, we created a DAL with new, important attributes, including: the ability to link separate activities and tasks to individual facility-specific field and case work, enabling us to calculate the average amount of time spent on each specific task; we would receive more accurate data; and we provided a user-friendly form with automated programming.

Next, we discuss the DAL data collection process.

### ***DAL Data Collection***

We collected DALs electronically, another major difference between the 2001 LPA workload study and this one. Rather than hand-entering LPA work activities on paper DALs, submitted by fax or mail (2001’s data collection format), ISR created an electronic data collection form using Abode LiveCycle, bypassing the need to hand-enter data.<sup>15</sup> LPAs accessed and populated this electronic data collection form on their laptop computers (the same computers they used for recording field work), and at the end of the work day emailed their DALs directly to ISR, with a programmed submission button at the end of the DAL.<sup>16</sup> We did not require that LPAs submit a DAL for full day absences. By the end of the 13 weeks, we received more than 23,000 individual DALs; these forms included activities in almost 14,000 separate facilities. ISR cleaned and formatted the submissions in Excel, and analyzed the submission with the widely used Statistical Package for the Social Sciences program [SPSS]).

**Sampling:** As noted above, the data collection occurred over 13 weeks (September 15, 2015 through December 11, 2015), during which time CCL mandated that all LPAs track/submit their work activity every day. The 13 week data collection timeframe represents a sample of LPA workload throughout the year, given that it is not practical or cost effective to record work activity at this level of detail for an entire year.<sup>17</sup>

**Mandate:** Unlike prior data collection efforts, for the 2015 study CCL management mandated that all LPAs participate. This requirement significantly enhanced the reliability and generalizability of the data. In addition to the participation mandate and as a way to ensure maximum LPA participation, CCL designated two monitors: staff members (primary and backup) at each regional office (RO), who tracked their LPAs’ daily submissions—noting whether the LPA had submitted her or his form, or if they had an excused absence. To automate the process, the DAL’s submission button automatically emailed the form directly to the correct regional office monitors and to ISR. The RO monitors were not expected to review individual DAL submissions, but to track and record LPA submissions daily, and send the information to ISR on a weekly basis.

***The regional office tracking monitors played an integral role in maximizing LPA participation, and ultimately the success of this study.***

**Piloting, Training and “Customer Assistance”:** After pilot testing the new DAL with a small sample of LPAs and making appropriate revisions, ISR conducted statewide mandatory training sessions to show LPAs how to populate and submit the DAL, and training sessions with the RO monitors, teaching them how to use the Excel worksheet tracking forms ISR developed for each regional office. CCL trainers provided technical support and CCL made the training session recordings available to LPAs and regional office staff. Moreover,

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<sup>15</sup> Otherwise, ISR modeled the second form closely on the 2001 form.

<sup>16</sup> Because of the realities of the LPA’s field visit schedules, access to internet connections, etc., occasionally LPAs held activity logs for more than one day, then submitted them to ISR in batches.

<sup>17</sup> ISR selected the data collection timeframe upon guidance from the Workgroup Committee as being typical of the larger work year, and as representative of a full year.

CCL staff created a frequently asked questions (FAQ) document which they updated regularly during the first month of data collection. CCL staff posted the FAQ document on CDSS' internal Sharepoint site.

Following training, and to gain familiarity with the DAL, LPAs tested the DALs for three days the week before the official start of data collection; ISR provided extensive help for all aspects of the DAL.

For the first few weeks of data collection, ISR staff examined all daily submissions, identifying LPAs who were clearly struggling with some aspect of the DAL or submission of the DAL, and reaching out to provide assistance or clarifications. Typical problems included missing, unrealistic, or duplicative information, multiple submissions of the same DAL but with different dates, multiple DAL submissions with identical dates but different information, and using incorrect LPA identification codes. Spot checks of incoming logs continued throughout the data collection period. ISR contacted the RO monitors if they did not submit a weekly tracking form, or if the tracking form was incomplete. Maintaining open communication at all times, and understanding LPA and RO monitor frustrations, we tried to create, to the greatest extent possible, a successful, simple, and straight-forward experience.

### ***DAL Submission Statistics***

LPAs recorded activities and tasks in two broad categories: general, supportive duties not specific to a facility, and facility-specific field and case work. General supportive non-field work duties include file review, phone calls, initial incident report review, staff meetings, processing civil penalties, etc. Facility-specific field work includes all pre-visit preparations, site visits, travel, post-visit paperwork, and related desk work. Other facility-specific case work not typically related to a site visit include work done on incident investigations, appeals, waivers, special case management situations, etc.

In the end, 85% of the division's case-carrying LPAs submitted data that were usable for analysis (Table 2.1). Note that while these LPAs submitted "good" DALs, on average about 7% of the individual entries on those good DALs were not useable (Table 2.2). Appendix Chapter Two Section A discusses several data cleaning issues that arose during additional cleaning.

**Table 2.1: Number and Percent of LPAs Included and Excluded from Data Analysis, by Program Area (Case-carrying LPAs)**

	CRES	ASC	CC	Division
Initial number of LPAs*	97	173	210	480
Number of LPAs excluded from analysis**	12	30	28	70
Number of LPAs with useable data	85	143	182	410
Percent of LPAs with useable data	88%	83%	87%	85%

\*Based on the number of unique LPA codes as recorded on the DALs

\*\*LPAs were excluded for reasons including multiple instances of the following: incorrect, inconsistent, and/or inadequate entries

**Table 2.2: Number of Rows (15 Minute Segments) Recorded by LPAs with Useable Entries (Case-carrying LPAs)**

	CRES	ASC	CC	Division
Original rows of data	141,388	267,798	331,578	740,764
Rows with no activity recorded (Percent)	11,736 (8.3%)	19,218 (7.2%)	22,545 (6.8%)	53,499 (7.2%)
Training activity rows	3,205	6,507	4,803	14,515
Personal/break/leave rows	14,140	24,413	30,982	69,535
Activity rows remaining for analysis	112,307	217,660	273,248	603,215

Table 2.3 (next page) shows the number of individual facilities, facility visits, and complaints reported in the final data set.

**Table 2.3: Number of Facilities, Number of Facility Visits, and Number of Complaints Received (Case-carrying LPAs)**

	CRES	ASC	CC	Total
<b>Number of individual facilities*</b>	1,546	3,242	9,121	13,909
<b>Number of non-complaint visits</b>	1,668	2,254	10,451	14,373
<b>Number of complaints**</b>	1,858	1,559	1,958	5,375
<b>Number of complaint visits***</b>	2,531	1,849	2,185	6,565

\*Total number of facilities with at least one non-complaint activity or task. Activity examples: application work, inspections, complaint investigations. Task examples: pre-visit paperwork, site visit, related desk work. Typically LPAs recorded multiple entries (15 minute rows) for a given license number.

\*\*This number includes facilities with license numbers and those without license numbers. Unlicensed complaints are included with licensed facility complaints. Some facilities had non-complaint *and* complaint visits; those facilities will appear in both counts in the above table. Typically LPAs recorded multiple tasks for a given complaint control number.

\*\*\*During some visits more than one complaint was investigated. Unlicensed complaints are included with licensed facility complaints.

Now we turn to the first steps to create LPA Staffing Needs and Budget Standards, using these hundreds of thousands of data points.

### ***DAL Data Methodology: Two Key Roles***

LPAs submitted their daily data using program-specific DALs, which in turn created three program-specific data files (children’s residential, adult/senior care, and child day care). We always maintained separate program area data sets, but performed the same cleaning, formatting, and analysis protocols in all sets. See Appendix Chapter Two for additional details. All methodology discussions apply equally to the three program areas. CCIB LPA submissions were initially cleaned and formatted with the same protocols, but the analysis was modified for the wholly different nature of their work; Chapter Six contains CCIB-specific methodology and findings.

Most broadly, DAL data served two key roles in the development of the LPA Staffing Needs and Budget Standards; the first key role informs the proportion of time LPAs do field and case work and the proportion they do general supportive work (non-field work, typically in-office), the second key role uses DAL data to calculate average times per activities and tasks.

#### ***First Key Role***

We begin by categorizing LPA work into three categories: field work, case work not related to field visits, and general supportive non-field work duties. LPAs perform many tasks which support the first two categories, but the third category is important as well. This category of general supportive duties must be included when determining how much time it takes for one LPA to complete the other two categories.<sup>18</sup> The first key role provides a high level picture of each category size, relative to the other categories. In other words, do LPAs spend more time doing field work than any other work? Do they spend equal amounts of time in each category?

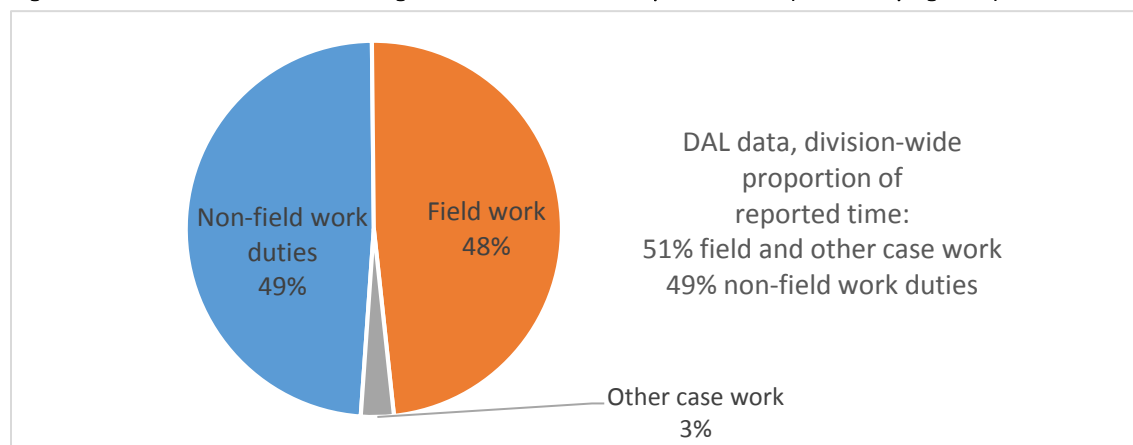
To illustrate this, we created the pie chart in Figure 2.1., which illustrates the percent of LPA time spent in each category. This pie chart uses division level DAL data, and is a reasonable approximation of how LPAs spent their work hours within each program area. As seen in the figure, roughly 48% of LPA work hours

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<sup>18</sup> Chapter Three describes field and other case work tasks, and Chapter Four describes the general supportive duties.

were spent on field work tasks (including related preparations, site visits, and travel), three percent on other facility-specific case work, and 49% performing general supportive non-field work duties.<sup>19 20</sup>

**Figure 2.1: DAL Data: Workload Categories as a Percent of Reported Time (Case-carrying LPAs)**



This first key role hinges on that 48% field work figure, because we can only predict field work, not the other two work categories:

1. LPAs typically spend 48% of their work hours doing field work, based on DAL data
2. A predicted increase in field work means LPAs need more work hours
3. Because field work hours consume 48% of an LPA's work hours, and we can determine the number of field work hours, we can calculate the amount of time the other two categories of work will require

As an illustration: we forecast that the division needs 10,000 hours to perform all field work next year. We know that field work makes up 48% of all LPA work. We therefore calculate the division needs enough staff to work 20,833 hours next year (10,000 hours is 48% of 20,833).

Additional discussion of this first key role, including program area tables, pie charts, and supporting DAL data are in Appendix Chapter Two Section B: Appendix Figures 2.1, 2.3, and Appendix Tables 2.2, 2.3, and 2.4.

### *Second Key Role*

DAL data's second key role is to tell us how much time it takes, on average, to perform the various field work activities. When we know how long it takes to complete a given activity, and we can predict how many of those activities will occur, we can calculate the total time needed to complete all of the predicted activities. We do this for all types of field work (inspections, investigations, etc.), add them all up, generating the grand total number of hours to complete all predicted field work activities.

To develop the amount of time it takes to perform field work activities, we analyzed the data attributed to each task that an activity requires. In general, an inspection requires the following tasks: pre-visit preparation, site visit, post-visit paperwork, other related desk work, and travel. We tallied all hours recorded for each of the tasks, and divided the total hours by the number of facilities associated with each

<sup>19</sup> Note that the pie chart displays data reported by the 85% of LPAs who turned in useable DALs, and therefore we consider it reasonably representative of LPA work at the current staffing level.

<sup>20</sup> LPAs cannot perform field work in the absence of general supportive non-field work.



task, to find the average amount of time LPAs spent on each task. When we have that time per task for all activity tasks, we simply add the average times together for the total time it takes for one facility inspection.

As an example, if LPAs reported 50 hours preparing for inspection site visits, and they supplied 25 different facility license numbers for those hours, then on average they spent 2 hours preparing for the inspection visit.<sup>21</sup> Similarly, if we determine that on average it takes 2 hours for an inspection site visit, half an hour for post-visit work, one hour for related desk work, and one hour for travel, then we know that one complete inspection requires an average 6.5 hours.<sup>22</sup> We multiply 6.5 hours times the predicted number of inspections in one year, arriving at the total annual time needed for all projected inspections.

We used this method to develop total time per activity just for facility-specific field work, because we can only predict the volume of this type of work, but not other types. In other words, we can predict the number of inspections the division should perform, but we cannot predict how many times LPAs will attend meetings, or how often they will receive requests to look up facility information, or how much time they will spend processing civil penalties. (Recall that the first DAL data key role accounts for time spent on general supportive types of work later, only after we know how much time LPAs will spend on field work.)

In summary, DAL data:

- Reveals the proportion of worked hours LPAs spend on casework and general supportive duties
- Provides a mechanism to project hours needed for non-facility-specific work
- Provides reliable time per task and total time per activity, for facility-specific work

Now we turn to the problem of how to identify and how to measure work that LPAs could not complete at the current staffing level.

### *Identifying and Measuring Undone Work*

#### *Data sources*

By definition, measuring the amount of work reported during data collection cannot tell us what work did not get done during that time. The Workgroup Committee developed several methods intending to account for this missing information:

- To measure stages of activity and task completion, the Committee added the “Amount Complete” field to each row (described above on page 12)
- ISR used CCL data that reported overdue application and inspection visits
- Following data collection, LPAs filled out a survey reporting undone work (defined as non-field work that remained on their desk at the close of data collection)<sup>23</sup>
- LPMs recorded any LPA tasks they performed, and how much time they spent doing those tasks, during the month of December

Fortunately, all but the first method proved extremely helpful, providing the critical pieces in accounting for undone work. Ultimately, we could not use completion data since some LPAs did not complete the field, and many LPAs used the field inconsistently: some indicated the completion stage each day they worked on a facility-specific task, others indicated such task completion over a span of more than one day.

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<sup>21</sup> Keep in mind that we excluded DAL data from 15% of the LPAs. We also cleaned the remaining data (such as excluding outliers, data which did not make sense, etc.).

<sup>22</sup> Travel time per site visit is calculated slightly differently, and is described in Chapter Three

<sup>23</sup> The LPA post-data collection survey is in Appendix B.

### *Overdue visits*

CCL generates visit-citation reports, which include the number of overdue application and inspection visits, by facility type and by program area. When we know how long each activity takes (including paperwork and travel), we can calculate how much time LPAs would have spent performing those activities. Appendix Tables 2.5, 2.6, and 2.7 show the number of overdue activities and the amount of time needed to do them, arriving at one measure of work LPAs could not perform at the current staffing level.

### *Measuring types and volume of undone work*

We gathered data from LPAs and LPMs after the close of data collection. LPAs completed a short online survey about what work (non-field work) remained on their desk at the close of data collection (December 11<sup>th</sup>). We asked LPMs to keep track of any LPA work they performed, and how long it took them to do that work, during December 2015. Appendix Tables 2.8 and 2.9 display these findings.

LPAs reported how much time they estimated it would take to complete backlogged general supportive work, and reported the number of non-visit-related case work they still needed to complete (waivers, exceptions, etc.).<sup>24</sup> Knowing how long those tasks take (the second key DAL data role), we computed the total amount of time it would take LPAs to complete them. However, because we do not know how much work they had already done on these incomplete tasks, in our calculations we only used half the average amount of time per task. We calculated the hours to finish the general work with hours needed to complete the undone case work tasks for the 13 week study period, and multiplied that total by four to approximate the annual amount of undone work (13 weeks is one fourth of 52 weeks). Unfortunately some LPAs did not respond to the survey; the Workgroup Committee decided to assume that the submitted survey responses were representative of all LPAs. We adjusted the calculated annual amount accordingly, as if reported by all LPAs. Appendix Tables 2.10, 2.11, and 2.12 provide supporting details. Next, we calculated the amount of work done by LPMs that should have been done by LPAs during one month, multiplied the amount by 12 to estimate the annual amount, and added those hours to the undone LPA hours. Table 2.4 shows the proportion of LPAs who responded to the survey, the adjusted annual estimated number of hours of undone work, hours of LPA work performed by LPMs, and the total hours.

**Table 2.4: LPA Post-Data Collection Survey and Estimated Annual Number of Undone LPA Hours (Case-carrying LPAs)**

	Response rate	Undone hours (annual, adjusted by response rate)	LPM hours performing LPA duties	Total hours to complete undone LPA duties
CRES	65%	8,405	1,312	9,717
ASC	72%	17,056	2,305	19,361
CC	77%	9,364	1,172	10,536
Division	71%	34,825	4,789	39,614

In order to understand the impact of the undone hours, we calculated the number of LPAs needed to perform those hours of undone LPA work. Dividing the undone hours by 1,689 (the number of hours one LPA has per year to do LPA work), we see that the division would need an extra 23 LPAs for the amount of work that is going undone at current staffing levels, according to the data reported by LPAs and LPMs (Table 2.5, next page).

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<sup>24</sup> Note that we excluded unreasonable responses.

**Table 2.5: Total Undone LPA Duty Hours and the Number of LPAs to Perform those Hours (Case-carrying LPAs)**

	Total LPA hours to complete undone duties	Number of LPAs needed to work those hours
CRES	9,717	5.75
ASC	19,361	11.46
CC	10,536	6.24
Division	39,614	23.45

Appendix Chapter Two Section C describes how we incorporated the overdue visit measures as well as the undone general and case work hours into the LPA Staffing Needs calculations.

We next discuss how we projected workload volume, Component B listed at the beginning of this chapter.

### *Data Sources for Projecting Workload Volume*

While DAL data provides how much time LPAs spend doing field work relative to general supportive work, and how much time, on average, it takes to do field work tasks and activities, it only works in concert with projected field work, i.e., workload volume (inspections, investigations, and so on).

CCL provided the following critical sources of data with which we could reasonably project future workload volume.

- Licensing Information System: This system provided the number of licensed facilities for the previous three calendar years, by facility type
- Application Information: This data provided two years of the number of approved and provisionally approved applications<sup>25</sup>
- Visit-Citation visit count reports: Three calendar years of all visits, by visit type and facility type (both visits made and those that were missed (“overdue”))
- Visit-Citation complaints received counts: The number of received complaints for the previous three calendar years, by facility type
- Complaints received and related complaint visits: One calendar year of the number of visits LPAs performed for each closed complaint, by facility type
- Number of complaints about Foster Family Agencies (FFA) and Certified Family Homes (CFH): Three years of complaint visits reported in CCL’s case management system against FFAs, and the number of these visits that were actually against a CFH under the agency’s purview.<sup>26</sup>

The bulk of visits occur for three primary activities: licensing applications, inspections, and complaint investigations.<sup>27</sup> We projected the number of application visits with the number of approved and provisionally approved applications, averaged over the previous two calendar years (Appendix Table 2.15). We projected the number of inspection visits based on the three year average number of open, licensed facilities and the mandated inspection frequencies.

<sup>25</sup> We acknowledge that some portion of LPA time is spent working on applications that are denied or withdrawn; the children’s residential staff researched this matter and provided the total time, but we could not consistently measure or even estimate this amount of time across the other program areas; the Workgroup Committee decided to not incorporate this time into the children’s residential program figures.

<sup>26</sup> CCL’s case management system does not have separate codes for foster family agencies and certified family homes.

<sup>27</sup> Pre and post licensing visits for licensing applications, routine, unannounced, required inspections; unlicensed complaint task data were combined with licensed facility complaint data.

To project the future complaint investigation workload, we used a more involved set of calculations using multiple sources of data: a forecast of the number of complaints received, average number of visits to complete a full complaint investigation, and a ratio of received complaints to the number of open facilities (Appendix Tables 2.16 through 2.19 present all relevant data and calculations by facility type).

Appendix Table 2.20 shows the proportion of complaints filed against CFHs rather than FFAs, which the children’s residential program developed so we could appropriately parse out the work LPAs do for CFHs relative to FFAs; the CCL data system does not contain this specific information. The vast majority of complaints recorded against FFAs are CFH-related: only 2.2% of complaints are reported against FFAs; the remaining 97.8% are CFH complaints. With this knowledge we allocated 2.2% of projected complaint activities and supplemental visit workload volume to FFAs and the remaining portion to CFHs.<sup>28</sup> Appendix Chapter Two Section D provides extensive methodological details of projecting inspections, applications, investigations, and supplemental visits.

The remaining visit types, collectively known as “supplemental” visits in this report, are typically related to a primary activity. These supplemental visit types include case management, plan of correction, collateral, joint, and attempted visits (Appendix Table 2.21). While CCL’s visit-citation reports provide the number of these visit types by facility type, they do not link them with their related primary activity (application, inspection, or complaint investigation); we therefore kept primary and supplemental visits separate in our data as well. Some facility types had few if any of these supplemental visit types; to use the DAL data most conservatively, the workgroup agreed we would calculate the average hours per supplemental visit by program area rather than facility type. We did use facility type when we projected the *number* of these types of visits, multiplying the projected number of supplemental visits, per facility type, by the program-level average time per each type of supplemental visit.

Table 2.6 summarizes the projection sources and the relevant activity components projected with those sources.

**Table 2.6: Projection Bases and Time Factors for Annual Hours Projections (Case-carrying LPAs)**

Type of activity	Projection basis	Time per activity (includes all relevant preparation, paperwork, and travel)
<b>Applications</b>	Average number of approved and provisionally approved applications	Includes two visits: pre-licensing and post-licensing*
<b>Inspections</b>	Average number of licensed facilities, adjusted for inspection mandates	Based on time for one comprehensive inspection
<b>Complaint investigations</b>	Forecast ratio of complaints to average number of facilities, and number of visits per completed investigation	One initial investigation visit and additional time for subsequent investigation visits**
<b>Supplemental</b>	Average number of visits per year	Time for visit and travel

\*Except in child care; LPAs do not perform post-licensing visits

\*\*See calculation details in Appendix Chapter Two Section D.

Chapter Three presents the average times per primary activity, including all field work tasks, travel time, and supplemental visits based on the DAL data, and Chapter Four presents the general supportive non-field work duties reported on the DALs. Chapter Five shows the final results for all case-carrying LPA data analysis, and Chapter Six presents analysis and findings for CCIB LPAs only.

<sup>28</sup> Because CCL does not license or inspect CFHs, we did not need to adjust the projected FFA workload volumes for those types of field work.

## Chapter Three: DAL Data: Facility-Specific Field and Case Work

This chapter describes the average time it takes a case-carrying LPA to perform field work activities, average time LPAs travel during field days, and the number of hours these LPAs spent on other case work (work not related to a visit).<sup>29</sup> As a step toward determining the overall number of LPAs needed to manage projected workload demands, this chapter presents the following DAL data findings specific to case-carrying LPA work:

- The average time it takes to complete primary activities (licensing applications, routine inspections, and complaint investigations, including visit preparation, paperwork, etc.)
- The average time to complete supplemental visits (case management, collateral, etc.)
- Average travel time per visit, for all visit types
- Case-related work that is not specific to a primary or supplemental site visit (waivers, exceptions, etc.)

### *Primary Activities and Average Hours per Visit*

To determine the average amount of time it takes an LPA to complete a given activity, we first break out an activity's individual, related tasks. All primary activities have, at a minimum, the following tasks: pre-visit preparation, site visit(s), post-visit paperwork, related desk work, and travel. For the first four tasks, using DAL data we calculate the average amount of time LPAs spend on each of these tasks, per facility. We add up those four average task times, and add travel time (described below), arriving at the sum of these five tasks: the total average time to complete one activity, by facility type and by program area. To illustrate this, Table 3.1 presents routine inspection findings for each program area. Appendix Tables 3.1 through 3.6 provide facility-level findings for all inspection scenarios.

**Table 3.1: Routine Comprehensive Inspection Activity and its Component Tasks: Average Hours per Task and Total Hours per Inspection Activity, by Program Area**

Task	CRES	ASC	CC
Pre-visit preparation	.54	.63	.38
Site visit	2.25	4.33	1.75
Post-visit paperwork	.52	.65	.39
Related desk work	.5	.73	.38
Travel	1.41	1.02	.73
Total average hours	5.21	7.36	3.63

Licensing application and complaint investigation activities typically require more than one site visit.<sup>30,31</sup> LPAs perform one pre-licensing and one post-licensing visit per application, and to complete one complaint investigation, LPAs quite often need at least one initial and one subsequent investigation visit. The average time to perform each of these four visit types differs, so calculating the total amount of time needed for all work relative to licensing application and complaint investigation activities is more involved than the simple addition of routine inspection task hours depicted in Table 3.1. Data for the two multi-visit activities is reported and each step of the calculations presented, by facility type, in Appendix Tables 3.7, 3.8, and 3.9 (licensing applications) and Appendix Tables 3.10, 3.11, and 3.12 (complaint investigations).

<sup>29</sup> Recall that we calculated these findings using only cleaned data from the 85% of LPAs with useable DAL submissions.

<sup>30</sup> Except in family child care homes and child day care centers; LPAs do not perform post-licensing site visits in these facilities.

<sup>31</sup> Data reported on complaints filed against unlicensed facilities is combined with licensed facility complaint data.

Tables 3.2, 3.3, and 3.4 present the total average hours per primary activity, per facility type; these hours do include the necessary additional extra visit time for complete application and complaint investigation activities.

**Table 3.2: Average Hours to Complete All Work Associated with Licensing Application, Comprehensive Inspection, and Complaint Investigation Activities (CRES)**

Activity	AA	FFA	CFH	SFH	FFH	GH+
Licensing application	10.71	15.74	n/a	12.88	9.8	15.78
Routine Inspection	6.39	6.12	n/a	4.84	4.5	5.56
Complaint investigation	8.78	19.67	20.20	16.56	11.97	12.63

GH+: Group homes plus crisis nurseries, temporary shelter care facilities, community treatment facilities, and out of state group homes

**Table 3.3: Average Hours to Complete All Work Associated with Licensing Application, Comprehensive Inspection, and Complaint Investigation Activities (ASC)**

Activity	Adult Res	RCFE+	SRF	Adult Day	ARFSHN/RCFCI
Licensing application	12.89	15.47	15.54	13.27	18.86
Routine Inspection	7.07	7.30	6.63	7.28	9.2
Complaint investigation	11.59	9.97	10.27	10.98	10.39

RCFE+: Residential care facilities for the elderly and residential continuing care retirement communities

**Table 3.4: Average Hours to Complete All Work Associated with Licensing Application, Comprehensive Inspection, and Complaint Investigation Activities (CC)**

Activity	FCCH	CC+
Licensing application	4.11	4.34
Routine Inspection	3.54	3.71
Complaint investigation	11.88	16.64

CC+: preschool day care centers plus day care centers for school age children, infants, and mildly ill children

### ***Supplemental Visit Types and Average Hours per Visit***

LPAs also visit facilities for other reasons that are most often related to one of the primary activities. For example, as part of a complete complaint investigation, an LPA may make a collateral visit to another facility or residence, or may make a plan of correction (POC) visit after a routine inspection in which the LPA cited regulation deficiencies. The supplemental visit types are: case management, collateral, plan of correction, joint, and attempted visits, reported as visits related to a primary activity.

To make sure we accounted for all time spent doing the primary activities, we included the average hours spent on supplemental visit prep, paperwork, and related desk work tasks as part of the primary activity, and only add up the average hours per supplemental site visit and travel time to calculate the average amount of time LPAs need for these supplemental visits: We modified how we calculated this time per supplemental visit due to CCL data limitations: while LPAs recorded supplemental visits under the appropriate primary activity on the DAL, supplemental visit types are not linked to primary visit types in CCL's visit-citation workload volume records. This situation complicated how we could adequately project supplemental visits and how much time it would take to perform those projected visits; we provide more information on this situation in Chapter Two's discussion of projecting primary and supplemental workload volume (page 20).

Table 3.5 displays the average number of hours it takes to perform each supplemental visit type, by program area. Appendix Tables 3.13, 3.14, and 3.15 provide the facility-level hours per supplemental visit type.

**Table 3.5: Supplemental Hours per Visit, by Program Level**

Program Area	Case Management	Collateral	Plan of correction	Attempted	Joint
Children's residential program	2.41	2.23	2.15	1.91	3.01
Adult/senior care program	2.34	2.20	1.79	1.36	3.65
Child care program	1.98	1.57	1.55	1.04	2.21

### *Travel Time per Site Visit*

Table 3.6 presents how much total time an LPA spends traveling during field visit days, the average number of site visits LPAs make during field days, and the average amount of time an LPA spends traveling per site visit. We calculated the average travel time per site visit by dividing the average amount of time each travel day by the average number of visits each travel day.

We only calculate average travel times at the program level, because LPAs often travel to different types of facilities in the same day, they perform different types of site visits in the same day, and may travel to and from lunch during an extended site visit. Accordingly, we do not determine average travel time by facility type or by visit type. We do not distinguish between the first travel of the day and subsequent travel between facilities for the same reasons. In addition, an LPA may perform more than one type of visit during the same site visit (complaint and inspection, for example). Given these confounding factors, we do not parse out, analyze, or allocate travel data at the facility type or visit type.<sup>32</sup>

**Table 3.6: Average Hours Traveling, Number of Visits, and Travel Hours per Visit, by Program Area**

Program area	Average hours traveling per field visit day	Average number of visits per field visit day	Average hours per site visit
Children's residential program	2.64	1.9	1.41
Adult/senior care program	1.89	1.8	1.02
Child care program	1.92	2.6	0.73

Appendix Chapter Three Section B contains the calculated number of hours per activity, per facility type, using the hours per activity values in Tables 3.1 through 3.4 (above) and the projected number of activities (described in Chapter Two above and Appendix Chapter Two Section D).

### *Other Case-Related Work*

LPA duties include other facility-specific activities that are not related to a primary activity. Examples include working on exemptions, waivers, and updated plans of operation. We did not calculate the average time each of these activities take, because there is no reliable way to predict the future volume of these activities.<sup>33</sup> Accordingly, Table 3.7 (next page) simply displays the hours of case work time as reported on the DALs. Because this work is specific to facilities, and not a general supportive task, we grouped the data separately from the primary field work activities and general supportive work. This other case-related work is the third category of data mentioned in the Chapter Two Methodology chapter, and comprises approximately three percent of an LPA's time.

<sup>32</sup> CCL will have all travel data and may choose to study it further, which would take advantage of LPAs distinguishing between travel at the tail ends of their field days and travel between facilities during the field day itself.

<sup>33</sup> At this time there is no reliable source of trend data for these activities.

**Table 3.7: Total Hours of Case Work Reported on the DALs, by Program Area and Division**

<b>Case Work Activity*</b>	<b>CRES</b>	<b>ASC</b>	<b>CC</b>	<b>Division</b>
<b>Waivers/Exceptions</b>	80	271	165	515
<b>Appeals</b>	4	51	30	85
<b>Evictions</b>	0	40	1	40
<b>Updated Plans of Operation</b>	9	73	57	139
<b>Legal Actions</b>	236	657	743	1636
<b>Subpoena-Document preparations</b>	10	69	7	85
<b>Subpoena-Appearances</b>	6	14	16	36
<b>Special Case Management</b>	289	659	452	1400
<b>Total</b>	633	1834	1469	3936

\*Facility-specific work not associated with a primary activity or site visit.

Now that we have provided the average number of hours it takes to complete all work associated with primary activities, the average travel time per site visit, and time LPAs reported they spent on other facility-specific work not related to site visits, Chapter Four presents DAL LPA-reported hours spent doing the many general supportive non-field work duties during the study period.



## Chapter Four: DAL Data: General Supportive LPA Duties

Case-carrying LPAs perform a significant amount of work integral to their role that is not strictly related to their field work and other case-related work responsibilities. As noted in Chapter Two, LPA field work cannot happen in the absence of such general supportive LPA work. These LPA duties comprise roughly 49% of LPA hours, as reported by LPAs during the 13 week data collection period.<sup>34</sup> To understand how we arrived at this percentage, and the importance of that number, please return to the DAL Key Role section in Chapter Two (beginning on page 15): as the amount of field work increases, so does the amount of time LPAs spend in support of that field work. In other words, increasing LPA hours in the field also increases LPA hours in support of that work. If the division wishes to increase the proportion of LPA hours spent working in the field, and decrease the proportion of time spent doing general supportive non-field work duties, some portion of those latter duties must be performed by other, non-LPA staff.

LPAs typically perform these general supportive duties in the office, with some exceptions (off-site meetings, travel related to maintaining state vehicles, etc.). As reported by the LPAs and summarized in Table 4.1, they most often do routine desk work, administrative paperwork, and receive/return phone calls. Please see Appendix Table 4.1 for the supporting DAL data.

Instructions found on DAL page 4 instructed LPAs to record time spent filling out the DALs as an administrative paperwork task, which may account for its proportion of time. However, many LPAs incorrectly recorded DAL time under other types of tasks, such as routine desk work, or special projects. And, because many LPAs did not specifically identify time spent filling out their DALs, we cannot determine under which activity they reported that time.<sup>35</sup>

**Table 4.1: General Supportive LPA Duties, Number and Percent of Hours Reported on DALs (Case-carrying LPAs)**

Activity	CRES		ASC		CC		Division	
	N hours	Percent	N hours	Percent	N hours	Percent	N hours	Percent
<b>Routine desk work</b>	5320.25	38%	10489.5	42%	15503.5	46%	31313.3	43%
<b>Administrative paperwork</b>	1583.75	11%	4233.75	17%	4489.25	13%	10306.8	14%
<b>Phone calls</b>	1613.75	12%	2427.75	10%	5877.5	18%	9919	14%
<b>Meetings*</b>	1866.75	13%	2281	9%	2993.5	9%	7141.25	10%
<b>Review incident reports</b>	1761.25	13%	2863.25	11%	428	1%	5052.5	7%
<b>Travel**</b>	454.75	3%	300.25	1%	322.75	1%	1077.75	1%
<b>PRAs</b>	106.75	1%	137.25	1%	20.25	0%	264.25	0%
<b>Other</b>	1286.75	9%	2456.25	10%	3937.5	12%	7680.5	11%
<b>Total</b>	13994	100%	25189	100%	33572.3	100%	72755.3	100%

\*Meetings: includes staff, management, and stakeholder meetings, and group orientations.

\*\*Travel: related to car maintenance only

This completes our discussion of findings gleaned from the DAL data. We next turn to calculating the number of LPAs needed to perform all projected activities (LPA Staffing Needs), and the number of facilities one LPA can monitor per year (Budget Standards).

<sup>34</sup> Recall that these findings are representative of hours worked and reported by the 85% of LPAs who turned in useable DAL data, not the entirety of all LPA hours worked during that time.

<sup>35</sup> Anecdotally, it appears that by the end of the study period, LPAs most often reported spending no more than 15 minutes each day filling out their DAL.

## Chapter Five: 2015 Case-carrying LPA Staffing Needs and Budget Standards

This chapter presents and discusses this study’s key findings for case-carrying LPAs, most importantly the 2015 LPA Staffing Needs and Budget Standards. It ends with study limitations and recommendations.

Specifically, this chapter provides:

- Current LPA Staffing Needs based on 2015 methodologies
- Senate Bill 79, the recently passed amendments to two Health & Safety licensing inspections statutes<sup>36</sup>
- 2015 LPA Staffing Needs scenarios for each stage of the new legislation, by facility type
- Changes in the rate of inspections per 100 facilities
- 2015 Budget Standards by stage, by facility type
- Comparison of 2001 and 2015 Budget Standards, by facility type
- Study limitations:
  - DAL data
  - Methodologies
- Recommendations when adjusting these findings in anticipation of substantial division changes

### *Current Case-carrying LPA Staffing Need*

Under current Health & Safety statutes, LPAs must inspect facilities no less often than once every five years, and in addition, must inspect a randomly chosen 20% more facilities. Based on this “5 year/20%” scenario, and using data and projection formulae as reported in this study, CCL would be fully staffed if it had 558 case-carrying LPAs. Please see Table 5.1 for the number of LPAs per program area using the 2015 methodologies. While this number may be higher than expected, please recall the following: the revised methodologies calculate inspection hours using comprehensive inspection data, not KIT inspection data; the calculation now accounts for work currently undone, and also sets aside five percent of LPA time to align with training hours as specified in LPA duty statements.<sup>37</sup> Appendix Chapter Five Section A provides supportive data at the facility type level (Appendix Tables 5.1, 5.2, and 5.3).

**Table 5.1: Current LPA Staffing Need Using 2015 Methodologies, by Program Area and Division**

	CRES	ASC	CC	Division
<b>Routine inspection at least once per:</b>	5 years	5 years	5 years	
<b>Random inspection percent:</b>	20%	20%	20%	
<b>N LPAs to perform all case and non-case work:</b>	143	181	234	558

### *Senate Bill 79*

In 2015, the CA State Legislature amended several Health and Safety Code Sections specific to community care facility licensing inspections.<sup>38</sup> The amended statutes state that “the department shall conduct annual unannounced inspections of no less than 30 percent of every licensed community care facility”<sup>39</sup> and every

<sup>36</sup> Senate Bill 79 (Committee on Budget and Fiscal Review, Human Services, Chapter 20, Statutes of 2015)

<sup>37</sup> <http://www.cclld.ca.gov/Res/pdf/LPA-ChildCare.pdf> and <http://www.cclld.ca.gov/Res/pdf/LPA-Residential.pdf>, accessed July 11, 2016

<sup>38</sup> Sections 1534(a)(1)(A) and 1534(a)(1)(C) through (a)(1)(F), 1569.33(d)(1) through (d)(3)

<sup>39</sup> Except for foster family homes, see Health and Safety Code Section 1534(a)(1)(B)

community care facility should be inspected no less than once every three years, on and after January 1<sup>st</sup>, 2017. Beginning in January of each of the following two years, the statutes increase the number of routine inspections and decrease the number of random inspections in CRES and ASC: in essence, CRES and ASC facilities will have biennial inspections along with 20% random inspections in the second stage, and in the third stage, LPAs will inspect all ASC facilities annually. Please see Table 5.2, which is modeled after the published table posted online on the California Legislative Information portal.<sup>40</sup>

**Table 5.2: Senate Bill 79 Amendments to Health and Safety Codes 1534 and 1569.33**

		Existing law	Inspections must occur at least once every...		
			Stage 1: January 2017	Stage 2: January 2018	Stage 3: January 2019
		Inspections must occur at least once every...			
Program area	Child care facilities	5 years	3 years	3 years (same as Stage 1)	3 years (same as Stage 1)
	Children’s residential care facilities	5 years	3 years	2 years	2 years (same as Stage 2)
	Adult and senior care facilities	5 years	3 years	2 years	1 year
Number of case-carrying LPAs needed per stage*	Child care LPAs	234	269	269	269
	Children’s residential care facilities	143	149	151	151
	Adult and senior care facilities	181	202	210	258
	Total LPAs*	558	620	630	678

\*These italicized LPA numbers were not in the original published table.

These amendments significantly impact staffing levels moving forward. Under the current 5 year/20% inspection frequency statute, LPAs should inspect 36 out of every 100 facilities annually. When Stage 1 is implemented January 1, 2017, this number will jump 47%: from 36 to 53 annual inspections per 100 facilities. Please see Table 5.3 for the subsequent jumps in rates and percentages.

**Table 5.3: Rate of Inspections per 100 Facilities for Five Year, Triennial, Biennial, and Annual Inspection Frequencies**

Inspection frequency	Annual inspections (for 100 facilities)	Additional random inspections	Inspection rate	Change from previous rate	Percent change from previous rate
5 year/ 20% random	20 inspections (100 facilities/ 5 year frequency)	16 (20% of 80 facilities)	36		
Triennial (3 year) /30% random	33 inspections (100/3)	20 (30% of 67 facilities)	53	+ 17 facilities	47%
Biennial (2 year) /20% random	50 inspections (100/2)	10 (20% of 50 facilities)	60	+ 7 facilities	13%
Annual	100 inspections	0	100	+ 40 facilities	67%

<sup>40</sup> [https://leginfo.legislature.ca.gov/faces/billCompareClient.xhtml?bill\\_id=201520160SB79](https://leginfo.legislature.ca.gov/faces/billCompareClient.xhtml?bill_id=201520160SB79) accessed June 28, 2016.

### *2015 Case-carrying LPA Staffing Needs Overview and Findings*

The LPA Staffing Need is the number of LPAs needed to perform all projected work activities per year, and uses three basic components described in Chapters Two and Three:

- A. Hours to perform all projected case work activities
- B. Hours to perform all non-field work duties, those which support LPA case work
- C. Annual LPA hours available to perform both types of work

To calculate the LPA Staffing Needs, we simply add A plus B (for total hours) and divide by C (LPA hours).

We calculated this at the facility level, program level, and division level. Table 5.4 (next page) presents the LPA Staffing Needs per facility type for the following five scenarios:

- Current staff needs (5 year/20% random inspections based on 2015 methodologies)
- Stage 1: triennial/30% inspections in all facility types
- Stage 2: biennial/20% inspections in CRES and ASC facilities, triennial/30% in CC
- Stage 3: annual inspections in ASC facilities, biennial/20% in CRES, and triennial/30% in CC
- Alternate scenario: annual inspections in both CRES and ASC facilities, and triennial/30% in CC facilities<sup>41</sup>

Please see Appendix Chapter Five Section A Appendix Tables 5.1, 5.2, and 5.3 for current staff needs calculations, and Section B Appendix Tables 5.4, 5.5, and 5.6 for the triennial, biennial, and annual inspection frequency staff needs calculations. These appendix tables all contain detailed facility-level supporting data for Table 5.4.

The current scenario requires 558 case-carrying LPAs, Stage 1 requires 620 case-carrying LPAs, Stage 2 requires 630, and Stage 3 requires 678; CCL would need 689 case-carrying LPAs under the alternate scenario.

Note that the staffing needs in Table 5.4 are rounded to the nearest whole number, obscuring an increase of less than one position in some facility types. To see precise decimal values, please see Appendix Tables 5.7, 5.8, and 5.9. These appendix tables also present baseline LPA needs (the number of LPAs needed for all non-inspection work), providing a way to see the impact on staffing needs when the inspection frequency changes.

### *2015 Case-carrying LPA Budget Standards by Facility Type and Inspection Frequency*

A Budget Standard is the number of facilities one case-carrying LPA can monitor per year, taking into account all LPA duties. Table 5.5 (next page) presents each facility type's Budget Standard, based on the five differing inspection scenarios. Note that when the rate of inspections increases (the number of inspections per 100 facilities), the Budget Standard decreases, because LPAs spend more time performing more routine inspections for the same number of facilities.

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<sup>41</sup> CCL management requested this alternate scenario, which is not mandated in the current statutes

Table 5.4: 2015 Case-carrying LPA Staffing Needs Differing by Current, Upcoming, and Alternate Inspection Scenarios, by Facility Type (All Program Areas)

Scenario*	AA	FFA	CFH**	SFH	FFH	GH+	Extra LPAs***	CRES Program	ARF	RCFE+	SRF	ADP	RCFCI/ SHN	Extra LPAs***	ASC Program	FCCH	CC+	Extra LPAs***	CC Program	Division
Current	1	3	74	2	19	39	6	143	55	102	2	10	2	11	181	124	104	6	234	558
Stage 1	1	4	74	2	21	40	6	149	63	113	2	12	2	11	202	147	116	6	269	620
Stage 2	1	4	74	2	23	41	6	151	66	117	2	12	2	11	210	147	116	6	269	630
Stage 3	1	4	74	2	23	41	6	151	83	144	2	15	2	11	258	147	116	6	269	678
Alternate	1	5	74	3	29	44	6	163	83	144	2	15	2	11	258	147	116	6	269	689

All values are rounded here, and may not sum to division totals, see Appendix Tables 5.1, 5.2, and 5.3 for decimal values.

\*Current scenario: 20% random inspections and at least one inspection every five years; Stages as described above (and in Table 5.2); and alternate scenario: annual inspections in all children's residential and adult/senior care facilities, and triennial/30% inspections in child care

\*\*LPAs do not inspect certified family homes and therefore their staffing need does not change under the different scenarios

\*\*\*Recall that we calculated the program level "Extra LPAs" figures as a way to fully account for undone work, described in the undone work section in Chapter Two (page 18) and Appendix Chapter Two Section C.

Table 5.5: 2015 Case-carrying LPA Budget Standards by Current, Upcoming, and Alternate Inspection Scenarios, by Facility Type (All Program Areas)

Scenario*	AA	FFA	CFH*	SFH	FFH	GH+	Pro-gram**	ARF	RCFE+	SRF	ADP	RCFCI / SHN	Pro-gram**	FCCH	CC+	Pro-gram**
Current	232	129	149	73	164	30	111	92	74	67	95	31	170	258	141	199
Stage 1	176	110	149	68	145	29	107	81	66	62	83	29	68	216	127	173
Stage 2	161	105	149	66	135	28	106	77	67	60	79	29	65	216	127	173
Stage 3	161	105	149	66	135	28	106	61	52	50	62	26	53	216	127	173
Alternate	107	80	149	57	104	26	98	61	52	50	62	26	53	216	127	173

All values are rounded here, and may not sum to division totals, see Appendix Tables 5.7, 5.8, and 5.9 for decimal values.

\*Average of number of facilities in the program, divided by number of LPAs; the figures overshadow significant variance between facility types within each program

\*Current scenario: 20% random inspections and at least one inspection every five years; Stages as described above and in Table 5.2; and proposed alternate scenario: annual inspections in all children's residential and adult/senior care facilities, and triennial/30% inspections in child care

\*\*LPAs do not inspect certified family homes and therefore their staffing need does not change under the different scenarios

Table 5.6 (next page) presents a side by side comparison of the 2001 and 2015 Budget Standards, by facility type. The 2001 Budget Standards were calculated using an annual inspection frequency (with one exception: it used a triennial inspection frequency in family child care homes). For the purposes of comparison, the revised Budget Standards in Table 5.6 use annual inspections for a useful comparison with 2001 numbers (triennial in family child care homes).

In most instances, the 2015 Budget Standards are lower, meaning that one LPA can monitor fewer facilities per year than previously calculated, although the RCFE standard is the same in both years.

There are a few notable changes:

- The standards increased in adoption agencies and foster family agencies, which may be due to the following:
  - Due to low numbers of activities, both studies substituted some foster family agency activity hours per task values when missing adoption agency values
  - Foster family agency findings are somewhat obscured since those agency records often contain certified family home data. The current standards used CRES program data that showed what proportion of complaints were reported against certified family homes rather than the foster family agency. Pulling the complaint data apart most likely led to the large change in standards in both facility types between 2001 and 2015 (since we ultimately used some foster family agency data to substitute for missing adoption agency data).
- The two studies used different methodologies when calculating certified family home standards: in 2001, ISR performed a separate eight month study of complaints in those homes, and the 2015 study parsed out certified family home complaints from foster family agency complaint data, and incorporated supplemental visit time into the new certified family home standard.
  - In 2001, the certified family home standard was 272 homes per LPA; in 2015 it dropped 45%, to 149 facilities per LPA, indicating LPAs spend a significantly larger amount of time monitoring those facilities than estimated in 2001 (but the large drop may also be due in part to differing methodologies in 2001 and 2015)
- The 2015 RCFCI and RFSHN facility types are combined into a single finding, but the 2001 data only reported RCFCI findings

Please use caution when interpreting budget standard differences in adoption agency, foster family agency, certified family homes, and RCFCI/SHN Budget Standards

Table 5.6: 2001 and 2015 Case-carrying LPA Budget Standard Comparisons (Annual Inspection Frequencies)

Program area	Facility type	2001 Budget Standard	2015 Budget Standard*	Difference per one LPA	Comments
Children's Residential	AA	75	107	+32	2001 calculations substituted FFA values for hours per process when necessary; 2015 also substituted when necessary, but see FFA comments below; interpret difference cautiously
	FFA	43	80	+37	2001 calculations may have included some CFH visits; 2015 findings do not, and are based in part on the projected number of complaints lodged against FFAs only, using data not available in 2001; interpret difference cautiously
	CFH	272	149	-123	2001 standard based on separate eight month study of complaint records, 2015 standard used proportion of CFH to FFA complaint records to project future activities in CFHs (and FFAs as well)
	SFH	58	57	-1	2% fewer facilities per LPA
	FFH	113	104	-9	8% fewer
	GH	39	26	-13	33% fewer
Adult and Senior Care	ARF	65	61	-4	6% fewer
	RCFE	52	52	0	No change in standard
	SRF	70	50	-20	29% fewer
	ADAY	83	62	-21	25% fewer
	RCFCI/ RFSHN	46	26	-20	2015 standard combines RCFCI and RFSHN facility data, and the 2001 standard is only for RCFCI facilities, interpret difference cautiously
Child Care	FCCH	276	216	-60	22% fewer; both standards were calculated at triennial/30% inspection frequencies
	CC+	111	101 (with annual inspections)	-10 (difference with annual inspections)	For the purposes of <b>this table only</b> , we present this <b>annual</b> CC Budget Standard; the official 2015 Budget Standard in CC facilities of 127 (Table 5.5) is based on triennial/30% inspections. Supporting CC <b>annual</b> inspection data are not provided in this report (provided upon request).

\*Strictly for the purposes of this comparison, 2015 Budget Standard figures are based solely on annual inspection scenarios (except FCCH, see comments in the table).

This concludes the case-carrying LPA Staffing Needs and Budget Standards data presentation. The remainder of this chapter provides study limitations and recommendations.

## *Study Limitations*

### *DAL data:*

Workload studies are inherently limited, in that by definition, undone work is not reported. We believe we appropriately accounted for this shortcoming by gathering additional data several different ways, as discussed at length in the methodology chapter.<sup>42</sup>

In our professional opinion, not all LPAs turned in “good” data: we excluded logs from 15% of the LPAs who submitted entries of questionable value and we weighted the remaining data accordingly.

Not all LPAs respond to our survey asking about backlogged/undone tasks. We weighted our use of the survey response data accordingly.

Much of an LPA’s case work is longitudinal in nature: it often takes more than one day or one visit or one task to complete an activity. For example, an LPA may work on an activity—such as a complaint investigation—multiple times, over many days or even weeks. Because we collected data for 13 weeks, we could not reliably follow many unique activities, because of the number that would begin before our data collection started, or would end following the close of data collection. And, if we limited a longitudinal analysis to only those cases that began and ended within the 13 weeks, our average time per case would necessarily be based on cases that are more quickly completed than others, or less complex in some way. Fortunately, because this longitudinal work is comprised of several discrete tasks, we could gather data on each of the tasks per facility or complaint, average the time per facility or complaint, and develop a total time per activity; in essence the total average activity time is the sum of the average task times. In other words the whole (activity) is the sum of the parts (tasks).

### *Methodology:*

When devising the “key role” methodology, we assumed that we could reasonably project all hours an LPA must do each year based on the percentage of field work LPAs performed during the study period. Projecting future work volume is only reliable when historical data are available, in this case, the average number of site visits per year. This method may obscure, to an unknown degree (but we feel a very small one), the percentage’s accuracy, because LPAs chose to conduct certain activities over others; i.e., we do not know if LPAs chose to work on non-case work in the office, rather than perform a facility visit, because of a backlog in their non-case work. If many LPAs chose to catch up on backlogs rather than go out in the field during the study period, the percentage of case work time might have been higher.

We assumed that any supplemental visit was necessarily associated with one of the three main case work activities (licensing applications, inspections, and complaint investigations). We did not investigate whether all reported supplemental visits did in fact have an associated activity; that level of granularity was beyond the scope of this study.

The calculations do not include time specifically spent working on applications that were ultimately denied or withdrawn. We do not know if the study findings would be substantially different if that time were included. However, we can say that including that time, as case work hours, would increase the total number of hours needed to perform all LPA work, ultimately *possibly* leading to a higher number of LPAs: if the increase in the annual number of hours was higher than 1,689 (the annual number of LPA work hours), then the staffing need would increase by one LPA.

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<sup>42</sup> We considered overdue licensing and inspection visits data, LPA post-data collection survey results, tracking of LPA duties performed by LPMs, and projecting full licensing and inspection visit compliance mandates.



We could not allocate the undone work hours to the different facility types because the backlogs were not reported by facility type. Therefore we simply added the number of LPAs needed to perform that undone work to the program total.

We combined all time LPAs spent working on complaints in licensed and unlicensed facilities, largely due to the relatively small number of unlicensed facility complaints. We do not know if grouping this data is a reliable method in this study, but in the absence of enough unlicensed complaint data, grouping the data created a more robust set of complaint data.

### ***Recommendations: Changing Workload Volume***

**Applications:** When anticipating a large change in the number of applications for a particular facility type, CCL may consider reformulating the application projection calculations. Because the current application projection formula uses two year averaged application numbers rather than forecasting a rate of applications per facility per year, the current formula would not be as sensitive to a large change in applications, relative to a smaller change in the number of open facilities. Upon request, we could discuss changing to a rate-based projection formula for applications.

**Complaints:** We do use a rate-based calculation to forecast the number of complaints per year; in most facility types using an average number of complaints masked an increase in the rate of complaints per licensed facility when we explored both methods. We recommend that the complaint projection formula continue to be rate-based, to forecast a future complaint investigation workload that is more sensitive to the number of facilities.

**Changing number of licensed facilities or visits:** The LPA Staffing Need is developed by projecting needed hours, based in part on average, historical data (for example, case management visits), and based in part on what should happen (for example, mandated number of annual inspections). In most calculations, we used the average number of open, licensed facilities. If CCL management foresees a change in the number of facilities in a particular facility type, a change which significantly deviates from the historical average, they must enter that new data into the base formulas that comprise the Staffing Need. In addition, changing the frequency of certain activities, such as the number of routine inspections, impacts the portion of the Staffing Need that is based on hours to complete all projected inspections, but not the hours to complete other types of work. The LPA Staffing Needs tables (Appendix Tables 5.4 and 5.5) illustrate this point: radically increasing the number of inspections, for instance by doubling the number, only impacts the total hours of inspection time, and doesn't double the time working on applications, or investigating complaints. Also remember that the number of hours to perform general supportive duties (non-case work) is a calculation based on the projected number of case hours, so doubling the number of annual inspections will also increase the general supportive duty hours (but won't double those hours).

### ***Recommendations: Increasing Case-carrying LPA Time in the Field***

There are two discrete ways to increase LPA presence in the field. One is global, the other individual.

The global method, increasing LPA presence in the field, requires hiring more LPAs, because field work does not happen in a vacuum, i.e., LPAs perform many other duties that are not case-related but yet essential to support field work. If the division wants more LPA time in the field, they must acknowledge there will be a corresponding increase in time LPAs need to spend doing non-field case and supportive work. More time in the field does *not* mean less time in the office. In other words, more time in the field means more time in the office which means more LPAs.

The individual method to increase LPA field time is to adjust the proportion of time an LPA spends on field work versus supportive work, i.e., reducing LPA non-case work responsibilities. In this scenario, more time in the field means less time spent doing supportive duties, which requires hiring other staff to perform

some portion of duties the LPAs currently perform. This individual way does not necessarily lead to hiring more LPAs, but it would necessitate shifting current LPA duties to other staff members, which may in turn lead to hiring more non-LPA staff.

ISR can teach CCL staff how to adjust the Staffing Need formulae, by increasing or decreasing the number of facilities, site visits, etc. This type of adjustment would increase supportive duty time, as described in the global method paragraph above. We can also teach staff how to or why to use ratio forecasting rather than averaging historical numbers.

We can also teach staff how to adjust the proportion of time LPAs should spend in the field, to measure the impact of using other support staff to perform current LPA non-case work duties. This type of adjustment would decrease LPA hours spent on general supportive duties, as described in the individual method paragraph above.

In summary, to be fully staffed with case-carrying LPAs, staffing projections based on these revised 2015 LPA Staffing Need and Budget Standard methodologies show a substantially increased need for LPAs.

Next, we complete this report by turning to Chapter Six, which presents data, findings, and recommendations for the unique Centralized Complaint and Information Bureau LPA staffing level.

## Chapter Six: Centralized Complaint and Information Bureau

### *Introduction*

This final chapter presents all data specific to Centralized Complaint and Information Bureau (CCIB) LPAs. Because the methodology for this analysis is less complex than that for case-carrying LPA data, this one chapter only presents CCIB information. The chapter begins with a brief introduction to the CCIB; followed by:

1. Methodology
2. DAL data
3. Call disposition data
4. Average time per call
5. Projection data
6. CCIB LPA Staffing Needs
7. Limitations and recommendations

CCL published the following description of CCIB in the division's Quarterly Update (Summer 2015) sent to licensees, parents, and stakeholders:

"The CCIB unit accepts complaints, general questions regarding the Title 22 regulations, conducts file reviews for the public, and provides criminal record clearance information for licensees and staff. Individual Regional Offices will continue to receive and process Unusual Incident Reports (UIR). By having CCIB take responsibility for the majority of the Officer of the Day functions, Licensing Program Analysts are able to spend more time in the field conducting visits; and, most importantly, assisting licensees with maintaining compliance with the regulations. CCIB is staffed with 21 Licensing Program Analysts, two Licensing Program Managers and a Bureau Chief. All CCIB staff have training in all of CCLD's licensing categories. CCIB was launched on January 20, 2015."

CCIB's initial staff of 21 LPAs perform general supportive duties, as do case-carrying LPAs, but much less frequently. As presented in Section 2 below, CCIB LPAs spend less than 10% of their work hours performing duties not specific to their CCIB duties.

### *Section 1: CCIB Methodology*

This methodology section assumes the reader is familiar with terms and methods presented in this 2015 report's Chapter Two and Appendix Chapter Two. The methodology in this chapter is virtually identical except when using the proportion of time CCIB LPAs spend doing quantifiable tasks (explained in Section 4 below).

#### **The 2015 Daily Activity Log**

When the Workgroup Committee revised the previous DAL prior to data collection in Fall 2015, it included selections specific to CCIB: one new activity meant for CCIB LPA use only: "CCIB." When an LPA selected CCIB as the activity, they then chose a task from a restricted dropdown list, which contained two CCIB-only tasks, and several tasks that CCIB and case-carrying LPAs perform:

- Task choices for CCIB LPAs only:
  - General phone calls
  - Facility-specific phone calls
- Tasks available to CCIB and case-carrying LPAs:
  - Review incident report
  - Receive complaint

- Meeting: tasks limited to management, legal, and meeting prep selections for CCIB LPAs
- File review/FAS/LIS lookup
- Special projects
- Emergency/fire drill

### DAL Data Collection

CCIB LPAs submitted DALs during the same 13 week data collection period as case-carrying LPAs: September 14<sup>th</sup> through December 11<sup>th</sup>, 2015. When a CCIB LPA submitted a DAL, the form's programming automatically sent the submission to their management staff, who in turn recorded each submission. CCIB management sent ISR the same type of weekly tracking form used by Regional Office (RO) management staff. And, just like the RO management staffs' efforts at tracking case-carrying LPAs, CCIB management staff's role in this data collection effort was essential and greatly appreciated.

### DAL Submission Statistics

Twenty-one LPAs (as determined by unique LPA identifying codes) submitted DALs. ISR graduate student staff monitored the submissions, guiding LPAs when necessary. Following the close of data collection, ISR cleaned the submissions for completeness and obvious inaccurate entries. ISR received 1,076 separate DALs, with almost 40,000 15 minute rows filled out. We excluded 6,680 rows of personal/break/vacation/sick time, leaving 32,111 15 minute rows for possible analysis.<sup>43</sup> ISR did not exclude any CCIB LPA's data in entirety, meaning 100% of CCIB LPAs submitted some amount of usable information. Table 6.1 shows the five different types of activities selected that ISR considered adequate for further cleaning. Note that for information purposes the table includes an activity category labeled "Unusable," which ISR excluded from all subsequent analyses presented in this chapter (4.49% of activity entries).

**Table 6.1: CCIB LPA DAL Activities: Initial Rows, Hours, and Percent of Time, Including Training and Unusable Entries**

Activity	Rows	Hours	Percent of time
CCIB-Telephone calls*	27,851	6,962.75	86.73%
CCIB-General duties	2,264	566	7.05%
Meetings	86	21.5	0.27%
Training	468	117	1.46%
Unusable	1,442	360.5	4.49%
<b>Total</b>	<b>32,111</b>	<b>8,027.75</b>	<b>100%</b>

\*All types: general, facility-specific, complaint-related

In the DAL section below, Table 6.2 provides the fully cleaned data entries we used for subsequent analyses. Data points dropped out when we examined facility license number and complaint control number fidelity; others dropped out if we determined the entry was unusable during this last cleaning pass through the data. The final cleaned data set contained 28,453 entries (7,113.25 hours; Table 6.2, next page).

<sup>43</sup> 6,680 rows (1,720 hours) reported personal, break, vacation, etc. type of activity. We excluded those rows from further analysis because we account for that time when calculating the CCIB LPA Staffing Need (see Section 4 in this chapter, below).

## Section 2: CCIB DAL Data Analysis

### Two Key Roles

As explained in Chapter Two's discussion of methodology for case-carrying LPA analysis, DAL data serves two key roles in developing a staffing needs determination. First, we use it to determine what proportion of time LPAs spend doing quantifiable work: complaint-related telephone calls in CCIB, fieldwork for case-carrying LPAs, and second, we determine the average amount of time CCIB LPAs spend on those types of work: average time per complaint-related telephone calls in CCIB, and fieldwork activities for case-carrying LPAs.

In CCIB, we have two sources of complaint call volume: the number reported on DALs during the study period, and the number reported in the call disposition data for the first 14 months CCIB was taking calls from the public. We first report DAL data results:

Table 6.2 presents the various activities and tasks as reported by CCIB LPAs on their DAL forms. According to the DAL submissions, CCIB LPAs spent 28% of their work hours on complaints, 40% on general phone calls, etc.

**Table 6.2: CCIB LPA DAL Data: Activity and Task Entries as Reported on DAL Submissions**

Activity	Task	N entries*	Hours	Percent of entries
CCIB duties	Receive complaint	8,089	2,022	28%
	General phone calls	11,553	2,888	40%
	Facility specific phone calls	1,214	304	4%
	File review	1,401	350	5%
	Review incident report	1,043	261	4%
	Special Projects**	2,825	706	10%
General supportive duties	Routine desk work	1,839	460	6%
	Administrative paperwork	412	103	1%
Meetings	Meeting with management	80	20	0%
	Internal meetings	1	0	0%
	Prep for meetings	5	1	0%
	Group orientation	71	18	0%
Grand Total		28,528	7,132	100%

\*15 minute rows

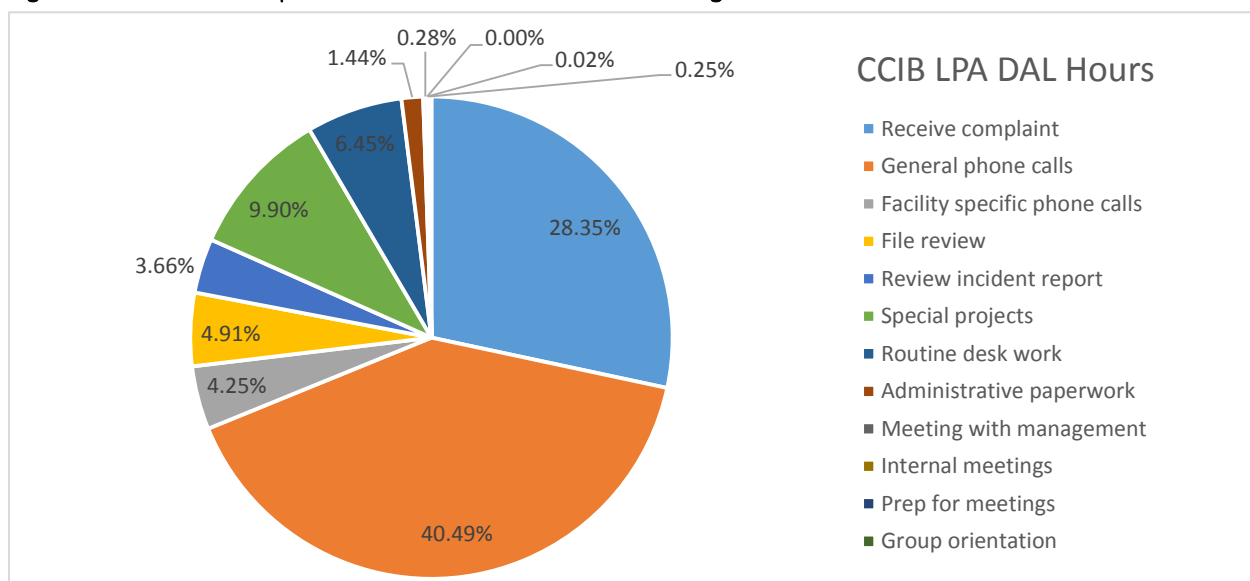
\*\*Special projects are included in the CCIB duty category because many entries reported facility license numbers.

However, when we examined all data rows by looking for complaint control numbers and facility license numbers, we found many instances of mis-categorized call time: CCIB LPAs reported complaint call time under all possible call categories. We determined that after re-categorizing these facility-specific entries, we found that complaint related calls actually make up 31.3% of work hours. Table 6.3 shows the re-categorized results, and Figure 6.1 shows the same data more visually in pie chart form.

Table 6.3: CCIB LPA DAL Data: Number and Percent of DAL Entries, Re-categorized

Activity	Task (re-categorized)	Cleaned	Hours	Percent of time
CCIB duties	Receive complaint	8,917	2,229	31.3%
	General phone calls	11,454	2,864	40.1%
	Facility specific phone calls	874	219	3.1%
	File review	1,392	348	4.9%
	Review incident report	804	201	2.8%
	Special Projects**	2,684	671	9.4%
General supportive duties	Routine desk work	1,839	460	6.4%
	Administrative paperwork	412	103	1.4%
Meetings	Meeting with management	80	20	0.3%
	Internal meetings	1	0	0.0%
	Prep for meetings	5	1	0.0%
	Group orientation	71	18	0.2%
Grand Total		28,533	7,133	100.0%

Figure 6.1: CCIB LPAs: Proportion of CCIB LPA Duties Worked During 13 Week Data Collection Period



### Section 3: CCIB Call Disposition Data Analysis

Unlike case-carrying LPA data analysis, there is a second source of data which can provide a picture of how CCIB LPAs spend their work time. We present this alternate way to determine what proportion of time CCIB LPAs spend doing complaint-related work, in turn providing an alternate CCIB Staffing Needs scenario is Section Five of this chapter.

Call disposition data: CCIB management provided 14 months of call disposition records. Table 6.4 shows all calls consolidated by general call type. According to the call disposition records, 35% of CCIB LPA calls are complaint-specific. Appendix Table 6.1 shows all categories of calls received and sent by CCIB LPAs,

organized by type of call (complaint, general, CBCB, etc.), and by disposition (more call-specific information such as type of program, dropped or disconnected call, regional office referral, update information, etcetera).

**Table 6.4: CCIB LPA Call Data: Bureau Call Dispositions January 20<sup>th</sup> 2015 to April 30<sup>th</sup> 2016**

<b>Call Category</b>			
<b><u>Complaint related calls</u></b>	<b>N calls</b>	<b>Percent of category</b>	<b>Percent of all calls</b>
Complaint - Adult Care	7,383	25%	9%
Complaint - Child Care	8,633	29%	10%
Complaint - Children's Residential	3,858	13%	5%
Complaint - Senior Care	1,615	6%	2%
Complaint Against CCLD Staff	55	0%	0%
Complaint Follow Up	7,778	27%	9%
Subtotal	29,322	100%	35%
<b><u>General calls about programs</u></b>	<b>N calls</b>	<b>Percent of category</b>	<b>Percent of all calls</b>
CBCB Request	7,317	25%	9%
General Information - Adult Care	7,985	28%	10%
General Information - Child Care	6,678	23%	8%
Licensee Regulation Questions	4,094	14%	5%
Long Term Ombudsman (LTO)	138	0%	0%
General Information - Children's Residential	617	2%	1%
General Information - Senior Care	2,022	7%	2%
Subtotal	28,851	100%	35%
<b><u>Transfers/referrals out</u></b>	<b>N calls</b>	<b>Percent of category</b>	<b>Percent of all calls</b>
Internal Transfer to another Agent	1,836	27%	2%
Refer to Another Agency/Department	3,165	47%	4%
Refer to Regional Office	1,733	26%	2%
Subtotal	6,734	100%	8%
<b><u>Misc.</u></b>	<b>N calls</b>	<b>Percent of category</b>	<b>Percent of all calls</b>
File Review	5,655	59%	7%
Non Regulatory	1,593	17%	2%
Update Information	2,268	24%	3%
Subtotal	9,516	100%	11%
<b><u>Other*</u></b>	<b>8,993</b>		<b>11%</b>
<b>Total</b>	<b>83,416</b>		<b>100%</b>

\*examples include: dead air, dropped call, caller unavailable for callback

To reiterate: when projecting total hours needed to staff the CCIB bureau, we can use either source of the proportion of time spent working on complaint related calls: the 31.3% finding from the DAL submissions, or the 35% call disposition records findings; later in this chapter we present CCIB LPA Staffing Needs using both findings.

#### Section 4: CCIB Average Time per Complaint Call

We determined the average amount of time CCIB LPAs spend on complaint-related calls using the DAL data: We assigned a “CN” label for all calls that had a complaint control number (CN). We assigned a “Not CN-related” label to all calls with a facility license number but without a complaint control number, assuming the call was not related to a complaint.

As mentioned above, when we analyzed facility license and complaint control numbers for all call categories we found discrepancies between the call category and the type of call itself. Table 6.5 shows the original call categories and the number and time per each type of call after we re-categorized them.

**Table 6.5: CCIB LPA DAL Data: Call Categories, Number of Entries, and Number of Calls**

Call category	Number of rows (entries)	Rows with no identifier*	Percent with no identifier*	Number of calls	Number of not-CN-related calls	Number of CN calls	Number of CN rows
Receive complaint	8,089	1,043	15%	2,439	0	2,439	8,089
Facility-specific	868	95	11%	825	665	160	340
General	11,746	11,554	n/a**	146	93	53	99
Special projects	2,804	2,598	n/a**	91	31	60	141
File review	1,399	779	56%	550	544	6	9
Review IR	1,043	320	31%	322	230	92	239
Total	25,949	16,389		4,373	1,563	2,810	8,917

\*Facility license number and/or complaint control number (CN)

Once we re-categorized the facility-specific and complaint-related call data as accurately as possible, we calculated the average amount of hours CCIB LPAs spend on each complaint-related call:

- Total complaint-related hours: 2,229.25 hours (8,917 rows / 4 rows per hour)
- Total number of complaint-related calls: 2,810 calls
- Average hours per complaint-related call: 2,229.25 hours / 2,810 calls = .79 hours per complaint-related call

Now that we know that CCIB LPAs spend an average .79 hours per complaint-related call, we need to know how many complaint-related calls to expect annually. We can then calculate how many total hours CCIB LPAs will spend in one year working on those calls. The next section describes these steps.

#### Section 5: CCIB Projecting Call Volume and Total Hours

##### Step 1. Projecting future complaint call workload volume

For case-carrying as well as CCIB LPAs, developing an LPA Staffing Need formula requires some method to quantify future workload. For case-carrying LPAs, two or three years of multiple data sources provided a forecast base for approximately half of their entire workload. CCIB is a young bureau, however, and therefore does not have that type of trend data. In the absence of trend data, we would simply describe past CCIB LPA performance.

We developed a way to use one of the projection methods described in Chapter Two in combination with call disposition data: projected annual number complaints CCL can expect to receive. We believe it is reasonable to assume that if more complaints are forecast to occur, in turn CCIB will receive more complaint-related calls. Appendix Tables 2.16, 2.17, and 2.18 provide the rates of complaints per facility for 2013, 2014, and 2015, and the forecast number of complaints for 2016, based on a projected number of open facilities in 2016. Table 6.6 below shows part of those tables: the 2015 number of complaints and the



forecast number of complaints for 2016, and shows the percent increase in complaints from 2015 to 2016. The overall division level increase in complaints is 6.4%, when calculating the percent increase between 2015 and 2016.<sup>44</sup> Because CCIB receives more than one call per complaint at times, we project the future number of complaint calls, not just the number of complaints.

**Table 6.6: CCIB LPAs: Using CCL Visit-citation Reports to Determine Percent Increase in Complaint Calls**

Program	Facility Type	2015	Forecast complaints*	Percent increase
CRES	AA	3	1.57	-47.7%
	FFA	57	60.22	5.6%
	CFH	2,489	2,564.24	3.0%
	SFH	53	65.71	24.0%
	FFH	363	379.65	4.6%
	GH	1,518	1,636.58	7.8%
	<b>Total</b>	<b>4,483</b>	<b>4,707.97</b>	<b>5.0%</b>
ASC	ARF	1,727	1,760	1.9%
	RCFE	4,029	4,298.56	6.7%
	SRF	37	39.81	7.6%
	ADP	230	220.39	-4.2%
	RCFCI/SHN	42	49.85	18.7%
	<b>Total</b>	<b>6,065</b>	<b>6,368.61</b>	<b>5.0%</b>
CC	FCCH	2,285	2,521	10.3%
	CC	2,562	2,779.45	8.5%
	<b>Total</b>	<b>4,847</b>	<b>5,300.45</b>	<b>9.4%</b>
<b>Division</b>	<b>Total</b>	<b>15,395</b>	<b>16,377.03</b>	<b>6.4%</b>

\*This forecast is based on three years of data, please see all supporting data points in Appendix Tables 2.16, 2.17, and 2.18.

Table 6.7 (next page) shows the total number of complaint calls recorded in the call disposition data, the number recorded during the study period, and the projected complaint calls using the 6.4% increase figure. When we use the full set of disposition data to project the number of complaint calls, the result is more than 5,200 call higher than when we use the number recorded during the study period. Because we calculated the number of hours per complaint call using DAL data, we chose the lower, more conservative number that was based on the same time period to develop the CCIB LPA Staffing Needs figure.

<sup>44</sup> Projecting future complaint calls by program area or facility type is too granular a level for the purposes of this first CCIB workload study; we do believe that level of analysis could occur in the future when several years of call disposition data are available.

Table 6.7: CCIB LPAs: Calculating Projected Number of Complaint Calls

Disposition data source	N calls	12 months	Increase	Projected CN calls
14 months CN calls	29,322	25,133	6.40%	26,741.51
Data collection period CN calls	5,048	20,192	6.40%	21,484.29

### *Step 2: Calculating annual complaint-related call hours*

To determine the number of hours CCIB LPAs will work on the projected number of complaint-related calls, we multiply the projected call volume by the average hours per call: 21,484.29 projected calls multiplied by .79 hours per call = 16,972.59 total hours to work on complaint-related calls.

Section 6 shows how the projected annual complaint-related call hours figure generates the CCIB LPA Staffing Needs.

## *Section 6: CCIB LPA Staffing Needs*

### *2015 CCIB LPA Staffing Needs Under Two Different Assumptions*

To generate a staffing needs result, we incorporate the above findings into the same formula used to generate the case-carrying LPA Staffing Needs result. However, this section presents the staffing needs based on the two different proportions of complaint-related call time. The two results differ somewhat markedly, and show that CCIB needs approximately one-third to one-half understaffed given these workload study findings.

Based on the 31.3% proportion of time CCIB LPAs spend on complaint-related calls as reported in DAL data, CCIB needs 32 LPAs, or 11 more LPAs to be fully staffed:

- Projected number of complaint calls: 21,484.29
- Hours per complaint: .79
- Total projected complaint call hours: 16,972.59
- Total hours for all CCIB work: 54,225.5 hours (16,972.59 is 31.3% of that total)
- One LPA has 1,689 hours per year for CCIB work<sup>45</sup>
- 54,225.5 divided by 1,689 = 32 LPAs

Based on the 35% proportion of time CCIB LPAs spend on complaint-related calls as reported in the data collection period call disposition records, CCIB needs 28.7 LPAs, or 7.7 more LPAs to be fully staffed:

- Projected number of complaint calls: 21,484.29
- Hours per complaint: .79
- Total projected complaint call hours: 16,972.59
- Total hours for all CCIB work: 48,493 (16,972.59 is 35% of that total)
- One LPA has 1,689 hours per year for CCIB work
- 48,493 divided by 1,689 = 28.7 LPAs

<sup>45</sup>1,689 hours is one full-time employee's annual work hours to perform LPA duties (2,050 personnel year hours, adjusted for holidays, vacation time, allowed sick leave, other leave to 1,778 (as per communication with CDSS Financial Management and Contracts Branch, July 2014) and minus training hours (89 hours: five percent of LPA responsibilities: <http://www.cclid.ca.gov/Res/pdf/LPA-ChildCare.pdf> and <http://www.cclid.ca.gov/Res/pdf/LPA-Residential.pdf>, accessed July 11, 2016).

Currently, CCIB is staffed with 21 LPA positions. It is CCL's prerogative to decide which CCIB LPA Staffing Needs formula is the most appropriate. However, we do recommend the staffing need based on the call disposition data, because it is based on a full data set rather than based on the DALs, which is a sample of all CCIB LPA work (13 weeks of data collection rather than one year of call records, and we did not receive a DAL from all 21 CCIB LPAs for all days during data collection).

## *Section 7: CCIB LPA-specific Limitations and Conclusions*

### **DAL Data**

As with any workload study, results are only as valid as the data submitted by the study participants. As a group, CCIB LPAs submitted a respectable number of DALs compared to case-carrying LPAs. All CCIB LPAs participated and no CCIB LPAs were excluded from this workload study analysis, compared to 15% of case-carrying LPAs who were excluded from analysis. Regardless, we still consider the CCIB data set to be a sample of CCIB LPA workload, not the sum total of all hours they worked during the data collection period. And, we spent significant amount of time cleaning and correlating the CCIB LPA data, and believe we have a suitable data set.

### **Disposition Data**

CCIB provided a data set restricted to the time during data collection, and identified call duration for all calls during that period. Unfortunately, inbound calls are linked with call type, but outbound calls are not. Accordingly, we cannot use the data in conjunction with DAL data to calculate a total time for every call by call type. However, given the fact that we calculated similar percentages of complaint-related workload using DAL and disposition data, we believe we did count complaint-related calls well enough (31.3% of DAL data, 35% of disposition data).

### **Projecting Future Workload**

We calculate staffing needs using quantitative data to project future workload volume for both case-carrying and CCIB LPA workload. We did not have three years of CCIB-specific data upon which we could project future yearly workload. We also could not envision a way to associate the amount of general licensing questions to any quantifiable data source (such as trends in the number of open facilities, etcetera). We do know that on average, the number of complaints CCL receives, as a division, is increasing while the number of open facilities remains somewhat stable each year. Therefore we used that information to project an increasing complaint-related call workload volume. According to our analysis, that workload represents only about one-third of CCIB LPA work. But, given that this report is the initial workload analysis of LPAs in a relatively young bureau, other, more robust ways to project future workload volume may become apparent.

## Glossary of Abbreviations and Terms

- CRES: Children’s residential program
  - AA: adoption agency
  - FFA: foster family agency (and sub-agencies)
  - CFH: certified family home
  - SFH: small family home
  - FFH: foster family home
  - GH+ group home plus crisis nurseries, temporary shelter care facilities, community treatment facilities, and out of state group homes
- ASC: Adult and senior care program
  - ARF: adult residential facility
  - RCFE+ residential care facility for the elderly plus residential continuing care retirement communities
  - SRF: social rehabilitation facility
  - RCFCI/SHN: residential care facilities for the chronically ill/for those with special health care needs
- CC: Child day care program
  - FCCH: family child care home
  - CC+ child preschool center plus centers for school age children, infants, and mildly ill children
- PA or program: program area, such as CRES, ASC, or CC
- CCIB: Centralized Complaint and Information Bureau
- Division: CCL in its entirety—typically all three program areas, excluding CCIB unless specifically noted
- Case: carrying LPAs: LPAs who work within one of the three program areas; does not include LPAs working in the CCIB bureau
- DAL: daily activity log, used by LPAs to record their daily work
- 15 minute row: one row of time on the DAL, recording an LPA’s actions for the given 15 minute block of time
- Activity: category of work, can refer to case work as well as non-case work
- Primary activity: refers to one of the following three basic case work categories: licensing application work, inspection work, and complaint investigations, as defined on the DAL
- Task: a component of an activity, as defined on the DAL
- Duty: non-specific word to describe LPA work, can refer to an activity or a task
- General supportive work: non-field work duties LPAs typically perform in the office, such as answering phones, attending meetings, caseload analysis, coordinating shared office tasks with other LPAs, filing, looking up files, etc.
- Field work: all duties related to a specific site visit, including travel, time at the facility, prep work, post visit paperwork, and related desk work
- Case work: facility-specific work, can refer to a specific primary activity (licensing, inspection, investigation) or other activities such as work done updating a plan of operation
- Other case work: facility-specific work not related to field work, used to distinguish facility work apart from field work
- Supplemental visit: visits that are typically associated with a primary activity: case management, plan of correction, collateral, joint, attempted
- PRA: public records act: work spent pulling together facility records at the request of the public
- IR/DR: initial incident or death report review considered a general supportive task when the incident is first reported to CCL. Further investigation recorded as case or field work, as appropriate
- PY: personnel year: 2,080 hours of work, minus 302 hours for standard benefits (vacation, holiday, sick time, other leave) and minus 89 training hours (5% of annual hours as per LPA duty

statements), leaving 1,689 hours available for all LPA duties

- Extra LPAs: the number of LPAs each program area would have needed to accomplish undone work and overdue visits, according to data gathered during this study (total reported hours divided by the personnel year hours (1,689 annual hours))
- KIT: Key Indicator Tool: used during inspections; contains 20 to 40 items LPAs must check during an inspection visit. Tailored to each facility type, and intended to streamline annual inspections and focus LPA attention to regulatory items associated with poorly performing facilities
- Biennial: annual inspection conducted at least once every two years: a facility has a 50% chance of being inspected each year
- Triennial inspections: annual inspection conducted at least once every three years: a facility has 33% chance of being inspected every year
- Random (20% or 30%): LPAs conduct random annual inspections in 20% or 30% of facilities in addition to those facilities inspected under the biennial or triennial inspection frequency scenario in place
- LIS: licensing Information System: facility-specific data repository
- FAS: Field Automated System, data repository, with records of all facility visit reports and logs of incoming complaints
- Visit citation report: data reported by LPAs in FAS, recording visits LPAs made

or are overdue, by quarter and by year, all visit types. Also, a record of complaints received by each program

- Overdue visit: reported on the Visit Citation reports, indicating application and inspection visits that LPAs did not perform, considered the first measure of undone work, incorporated into the “extra LPA” calculation
- LPA post data collection survey: electronic survey administered to all LPAs after December 11<sup>th</sup>, 2015, asking about work that remained undone at the end of data collection. Recorded hours of general supportive duties, and counts of duties such as reviewing incident reports or processing waivers. Considered the second measure of undone work, and incorporated into the “extra LPA” calculation.
- LPM: licensed program manager
- LPM task tally: typical LPA duties performed by LPAs due to understaffing, reported during December 2015. Considered the third measure of undone work, annualized, incorporated into the “extra LPA” calculation
- LPA Staffing Need: the total number of LPAs it takes to perform all annual work associated with a facility type or program area (total hours of work divided by one LPA’s annual work hours); primarily uses anticipated numbers of applications, open facilities, and complaints along with the mandated number of routine inspections to project annual work hours
- Budget Standard: the number of facilities one LPA can oversee in one year